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*Co-Counsel to the Ad Hoc Committee of  
Governmental and Other Contingent  
Litigation Claimants*

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

----- X  
In re : Chapter 11  
:  
PURDUE PHARMA L.P., *et al.*, : Case No. 19-23649 (RDD)  
:  
Debtors<sup>1</sup>. : (Jointly Administered)  
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**APPLICATION OF OTTERBOURG P.C. AS CO-COUNSEL TO THE  
AD HOC COMMITTEE OF GOVERNMENTAL AND OTHER CONTINGENT  
CLAIMANTS FOR FIFTH INTERIM ALLOWANCE OF COMPENSATION FOR  
SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES INCURRED FROM  
JANUARY 1, 2021 THROUGH AND INCLUDING MAY 31, 2021**

<b><i>General Information</i></b>	
Name of Applicant:	Otterbourg P.C.
Applicant's role in case:	Co-Counsel to the Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants
Retention date:	September 16, 2019

<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtors' registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF L.P. (0495), SVC Pharma L.P. (5717) and SVC Pharma Inc. (4014). The Debtors' corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

Date of Order approving Debtors' payment of fees and expenses of Applicant:	December 2, 2019 [Dkt. No. 553]
<b><i>Summary of Fees and Expenses Sought in the Application</i></b>	
Time period covered for interim fees and expenses requested by this application:	January 1, 2021 through and including May 31, 2021 (the " <u>Application Period</u> ")
Amount of compensation sought as actual, reasonable, and necessary for the Application Period:	\$683,168.00
Amount of expense reimbursement sought as actual, reasonable, and necessary for the Application Period:	\$887.21
Total compensation and expense reimbursement requested for the Application Period:	\$684,055.21
Amount of compensation paid but not yet allowed to date:	\$0.00
Amount of expenses paid but not yet allowed to date:	\$0.00

<b><i>Summary of Previous Request(s) and Payment(s) for Compensation and Expense Reimbursement</i></b>							
<b>Application</b>	<b>Period Covered</b>	<b>Fees Requested</b>	<b>Fees Paid</b>	<b>Expenses Requested</b>	<b>Expenses Paid</b>	<b>Balance</b>	<b>Order</b>
First Interim Application Dkt. No. 955	9/16/2019 through 1/31/2020	\$646,606.50	\$634,943.70 <sup>2</sup>	\$2,956.87	\$2,956.87	\$0.00	Dkt. Nos. 1159 and 1306
Second Interim Application Dkt. No. 1456	2/1/2020 through 5/31/2020	\$336,192.00	\$331,192.00 <sup>3</sup>	\$1,604.92	\$1,504.92	\$0.00	Dkt. No. 1649

<sup>2</sup> At the request of the fee examiner, Applicant agreed to a fee and expense accommodation in the amount of \$11,662.80 in connection with its first interim fee application.

<sup>3</sup> At the request of the fee examiner, Applicant agreed to a fee and expense accommodation in the amount of \$5,100.00 (\$5,000 in fees and \$100 in expenses) in connection with its second interim fee application.

Third Interim Application Dkt. No. 1990	6/1/2020 through 9/30/2020	\$682,293.50	\$669,130.85 <sup>4</sup>	\$2,091.13	\$2,091.13	\$0.00	Dkt. No. 2144
Fourth Interim Application Dkt. No. 2525	10/1/2020 through 12/31/2020	\$904,388.50	\$904,388.50	\$851.68	\$851.68	\$0.00	Dkt. No. 2698
<b>TOTAL:</b>		\$2,569,480.50	\$2,539,655.05	\$7,504.60	\$7,404.60	\$0.00	

<i>Monthly Fee Statements Subject to the Application Period</i>						
Statement		Amount Requested		Amount Paid		
Period	Dkt. and Date	Fees	Expenses	Fees (80%)	Expenses (100%)	Balance
1/1/2021 – 1/31/2021	Dkt. No. 3170 Filed: 7/14/2021	\$154,976.00	\$0.00	\$0.00	\$0.00	\$154,976.00
2/1/2021 – 2/28/2021	Dkt. No. 3171 Filed: 7/14/2021	\$134,105.00	\$0.00	\$0.00	\$0.00	\$134,105.00
3/1/2021 – 3/31/2021	Dkt. No. 3217 Filed: 7/15/2021	\$148,287.50	\$870.21	\$0.00	\$0.00	\$149,157.71
4/1/2021- 4/30/2021	Dkt. No. 3218 Filed: 7/15/2021	\$170,295.00	\$17.00	\$0.00	\$0.00	\$170,312.00
5/1/2021- 5/31/2021	Dkt. No. 3219 Filed: 7/15/2021	\$75,504.50	\$0.00	\$0.00	\$0.00	\$75,504.50
<b>TOTAL</b>		<b>\$683,168.00</b>	<b>\$887.21</b>	<b>\$0.00</b>	<b>\$0.00</b>	<b>\$684,055.21</b>

This is a(n):	<input type="checkbox"/> Monthly
	<input checked="" type="checkbox"/> Interim
	<input type="checkbox"/> Final Application

<sup>4</sup> At the request of the fee examiner, Applicant agreed to a fee accommodation in the amount of \$13,162.65 in connection with its third interim fee application.

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AD HOC COMMITTEE OF GOVERNMENTAL AND OTHER CONTINGENT  
CLAIMANTS FOR FIFTH INTERIM ALLOWANCE OF COMPENSATION FOR  
SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES INCURRED FROM  
JANUARY 1, 2021 THROUGH AND INCLUDING MAY 31, 2021**

TO: THE HONORABLE ROBERT D. DRAIN,  
UNITED STATES BANKRUPTCY JUDGE:

Otterbourg P.C. (“**Otterbourg**” or “**Applicant**”), Co-Counsel to the Ad Hoc Committee  
of Governmental and Other Contingent Claimants (the “**AHC**”) in the above-captioned cases, in  
support of its fifth application (the “**Application**”) for allowance of interim compensation for

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<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtors’ registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF L.P. (0495), SVC Pharma L.P. (5717) and SVC Pharma Inc. (4014). The Debtors’ corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

professional services rendered and reimbursement of expenses incurred from January 1, 2021 through and including May 31, 2021 (the “**Application Period**”), respectfully states:

### **JURISDICTION, VENUE AND STATUTORY PREDICATES**

1. This Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334. This is core proceeding pursuant to 28 U.S.C. § 157(b). Venue of this proceeding is proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409.

2. The statutory predicates for the relief sought herein are Sections 330 and 331 of Title 11 of the United States Code (the “**Bankruptcy Code**”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), and Rule 2016-1 of the Local Bankruptcy Rules for the Southern District of New York (the “**Local Rules**”). This Application has been prepared in accordance with *General Order M-447*, the *Amended Guidelines for Fees and Disbursements for Professionals in Southern District of New York Bankruptcy Cases pursuant to Local Rule 2016-1(a) (as updated June 17, 2013)* (the “**Local Guidelines**”), and the *U.S. Trustee Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed under 11 U.S.C. § 330 by Attorneys in larger Chapter 11 Cases, effective November 1, 2013* (the “**UST Guidelines**” and, together with the Local Guidelines, the “**Guidelines**”). Attached hereto as Exhibit A is a certification regarding compliance with the Local Guidelines (the “**Cyganowski Declaration**”).

### **BACKGROUND**

3. On September 16, 2019 (the “**Petition Date**”), Purdue Pharma L.P. and its affiliates (the “**Debtors**”) filed voluntary petitions for relief under chapter 11 of the Bankruptcy Code.

4. The Debtors have remained in possession of their property and continue in the management of their business as a debtors-in-possession pursuant to Sections 1107 and 1108 of the Bankruptcy Code.

5. An official committee of unsecured creditors (the “UCC”) was appointed by the Office of the United States Trustee in these cases on September 27, 2019 [Dkt. No. 131].

6. On November 21, 2019, the Court entered the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals*, dated November 21, 2019 (the “**Interim Compensation Order**”) [Dkt. No. 529]. The Interim Compensation Order provides, among other procedures, that professionals are required to file and serve monthly itemized billing statements and interim fee applications.

7. On December 2, 2019, the Court entered an *Order Authorizing the Debtors to Assume the Reimbursement Agreement and Pay the Fees and Expenses of the Ad Hoc Committee’s Professionals* (the “**Fee Assumption Order**”). [Dkt. No. 553]. The Fee Assumption Order permits the payment of the fees and expenses of the AHC’s professionals, including Applicant, *nunc pro tunc* to September 16, 2019, and requires compliance with the procedures set forth in the Interim Compensation Order. A copy of the Fee Assumption Order is annexed hereto as Exhibit B.

**SUMMARY OF PROFESSIONAL COMPENSATION  
AND REIMBURSEMENT OF EXPENSES REQUESTED**

8. By this Application, Applicant seeks an order approving on an interim basis compensation in the amount of \$683,168.00 and expenses in the amount of \$887.21, representing actual and necessary expenses Applicant incurred in connection with its rendition of professional services to the AHC during the Application Period.

9. In accordance with the Interim Compensation Order, Applicant filed the following interim fee applications:

- On March 16, 2020, Applicant filed a request for first interim allowance of fees and expenses in this Case, covering the period from September 16, 2019 through and including January 31, 2020 [Dkt. No. 955]. The Court entered an order on May 15, 2020 approving that first interim request [Dkt. No. 1159]. On June 26, 2020 the Court entered a supplemental order permitting payment of the holdback amounts, less certain reductions of fees and expenses agreed to between Applicant and the fee examiner appointed in these cases [Dkt. No. 1306].
- On July 20, 2020, Applicant filed a request for second interim allowance of fees and expenses in this Case, covering the period from February 1, 2020 through and including May 31, 2020 [Dkt. No. 1456]. The Court entered an order on September 2, 2020 approving that second interim request [Dkt. No. 1649].
- On November 16, 2020, Applicant filed a request for third interim allowance of fees and expenses in this Case, covering the period from June 1, 2020 through and including September 30, 2020 [Dkt. No. 1990]. The Court entered an order on December 16, 2020 approving that third interim request [Dkt. No. 2144].
- On March 17, 2021, Applicant filed a request for fourth interim allowance of fees and expenses in this Case, covering the period from October 1, 2020 through and including December 31, 2020 [Dkt. No. 2525]. The Court entered an order on April 22, 2021 approving that fourth interim request [Dkt. No. 2698].

10. The following Monthly Fee Statements were filed by Applicant during the Application Period:

<b>Monthly Fee Statements Subject to the Application Period</b>						
Statement		Amount Requested		Amount Paid		
Period	Dkt. and Date	Fees	Expenses	Fees (80%)	Expenses (100%)	Balance
1/1/2021 – 1/31/2021	Dkt. No. 3170 Filed: 7/14/2021	\$154,976.00	\$0.00	\$0.00	\$0.00	\$154,976.00
2/1/2021 – 2/28/2021	Dkt. No. 3171 Filed: 7/14/2021	\$134,105.00	\$0.00	\$0.00	\$0.00	\$134,105.00
3/1/2021 – 3/31/2021	Dkt. No. 3217 Filed: 7/15/2021	\$148,287.50	\$870.21	\$0.00	\$0.00	\$149,157.71
4/1/2021- 4/30/2021	Dkt. No. 3218 Filed: 7/15/2021	\$170,295.00	\$17.00	\$0.00	\$0.00	\$170,312.00
5/1/2021- 5/31/2021	Dkt. No. 3219 Filed: 7/15/2021	\$75,504.50	\$0.00	\$0.00	\$0.00	\$75,504.50
<b>TOTAL</b>		<b>\$683,168.00</b>	<b>\$887.21</b>	<b>\$0.00</b>	<b>\$0.00</b>	<b>\$684,055.21</b>

11. Applicant attaches the following in support of this Application:

- Exhibit C is a summary of the compensation sought by Applicant by project code for the Application Period and a comparison to the Applicant's budget and proposed staffing plan.
- Exhibit D is a list of the attorneys and paraprofessionals who have worked on these cases during the Application Period, the aggregate time invested by each individual, the applicable hourly billing rate, and the amount of fees attributable to each individual, as well as the hours and time spent by position (e.g., partner, associate, clerk), blended hourly rates, and a comparison against the blended rates of other non-insolvency attorneys and professionals at Otterbourg.
- Exhibit E contains a copy of the computer-generated time entries reflecting the time recorded during the Application Period, organized in project billing categories by the Applicant.
- Exhibit F is a summary of reimbursement sought by the Applicant by expense type for all expenses incurred during the Application Period.



- Exhibit G contains a copy of the computer-generated list of expenses incurred during the Application Period.

### **SUMMARY AND HIGHLIGHTS OF SERVICES RENDERED**

12. During the Application Period, Applicant performed services on a variety tasks for the AHC, all of which are set forth in Applicant's detailed time records. The following summary is intended only to highlight some of the services rendered by Applicant during the Application Period and is not intended to be a complete recitation of all activities performed. Although every effort was made to consistently categorize the actual services provided into the appropriate category, certain tasks were interrelated and could properly be categorized in multiple categories.

#### **A. Plan and Disclosure Statement**

13. Prior to the Application Period, significant progress was made in connection with the formulation of a consensual plan of reorganization as a result of settlements reached with various public and private creditor constituencies. Significant issues, however, remained to be resolved.

14. During the Application Period, the AHC continued to work with the Debtors and other interested parties to memorialize the settlement agreements into a plan of reorganization and to resolve the remaining open issues. During the Application Period, Applicant reviewed the multiple iterations of term sheets of the plan of reorganization, including comments received from various parties to the negotiations. At times during the Application Period, the term sheets were being updated on a daily basis with the input from multiple constituencies. Such term sheets were ultimately converted into a plan of reorganization, and corresponding disclosure statement, that were filed with the Court on March 15, 2021. During the course of the Application Period, four amended plans of reorganization were filed by the Debtors. Applicant

reviewed the changes and analyzed the impact upon the AHC creditor constituency for each of the filed plans of reorganization.

15. In addition to the plan of reorganization and disclosure statement, there were several necessary supporting documents that are required to be negotiated and filed in connection with the approval of any plan of reorganization. Critical to carrying out the terms of the plan of reorganization is the formulation of the governing documents that will control the trusts to be established to carry out the various goals of the plan, including making distributions to private parties and overseeing the distribution of funds to be used for abatement. Applicant spent time reviewing the various term sheets, the corresponding drafts of documents, the remaining open issues to be resolved and the positions of the various parties. These negotiations required ongoing and numerous rounds of discussions with the Debtors, the Department of Justice (the “**DOJ**”), the UCC and the Non-Consenting State Group (“**NCSG**”). Applicant and co-counsel would report back to the AHC on the status of negotiations and what terms would be acceptable.

16. During the Application Period, Applicant had weekly calls (usually several times a week) with co-counsel to discuss the status of negotiations and also had calls with subsets of the AHC that were primarily responsible for negotiations. Applicant also regularly spoke with various subgroups of the AHC (including the mediation subgroup and the states’ plan negotiation subgroup), as well as counsel for the NCSG regarding open plan issues and participated in meetings with the other creditor groups.

17. During the Application Period, Applicant and the other AHC professionals continued to consider alternative plan options should the Sacklers and the NCSG fail to reach a resolution. Applicant reviewed the terms of such alternative plan structure, including the pros and cons of such alternative plan and helped report on such analyses to the AHC so that the AHC

could make an informed decision regarding alternatives. Applicant spent time analyzing a proposal made by a third party for a private sale of the Debtors' assets, including reviewing the AHC's financial advisors' analyses of the proposal and comparison to other plan options. In connection with this option, Applicant participated in many calls with the AHC's advisors, the AHC, the NCSG and the Debtors.

18. In addition, Applicant attended the May 26, 2021 hearing to consider the disclosure statement, which was continued in June and, after multiple hearings, ultimately approved by the Court in the beginning of June.

**B. Claims Analysis**

19. In accordance with the previously entered bar date order, on July 30, 2020, a consolidated claim was filed on behalf of forty-nine states, the District of Columbia and six territories (the "**Claimants**"), which asserted damages in excess of \$2 trillion (the "**Consolidated Claim**"). During the Application Period, Applicant worked with counsel for the NCSG, who represented approximately half of the Claimants that filed the Consolidated Claim, to review issues still being analyzed by the Debtors and their financial advisors and to respond to inquiries from different states regarding the Consolidated Claim. Ultimately, the focus during the Application Period turned from claims issues to formulating a consensual plan of reorganization.

**C. Asset Analysis and Recovery**

20. During the Application Period, Applicant monitored the status of litigation against the insurance companies, the results of which may result in significant recoveries for the benefit of creditors to be used for abatement. The AHC's co-counsel is taking a leading role in the litigation of the Debtors' claims. Without duplicating efforts, Applicant has been monitoring and is keeping itself apprised of the status of the insurance litigation, as it is an important source of

recovery for creditors. In addition, Applicant monitored ongoing disputed between and among the Sackler family and other parties regarding the production of documents and unsealing of certain documents.

**D. Case Administration/General Services/Business Operations**

21. During the Application Period, Applicant participated in many conference calls and videoconferences with its co-counsel, individual members of the AHC, and other parties to these cases, including, among others, the DOJ, counsel to the NCSG and counsel to the multi-state group. Applicant also reviewed the pending motions before the Court and participated in court hearings. Applicant also participated in interviews of a new monitor when the then current monitor resigned.

22. Throughout all of these activities, Applicant organized with co-counsel by regularly communicating among the firms and determining the specific tasks to be undertaken by each. It was also particularly important given the size of the AHC that subsets of groups could organize and have a point of contact to discuss issues specific to each constituency and communicate them to other co-counsel and the remainder of the AHC group. Applicant primarily coordinated with the states on intra-committee issues to ascertain their positions and seek solutions. While there were activities that necessarily required full participation of the professionals, tasks were coordinated to avoid duplication of efforts.

23. Applicant also prepared and filed monthly fee statements and its fourth interim fee application as required by the Compensation Procedures Order.

**E. Meetings and Communications with Ad Hoc Committee**

24. Throughout the Application Period, Applicant and its co-counsel kept the AHC members advised of all matters in these cases, providing regular updates and responding to inquiries. The AHC has weekly update calls with the entire AHC and also has regular calls with

the subcommittees, some of which occur on a weekly basis and others on an as-needed basis. Certain more pressing issues required multiple conference calls in a single day. Applicant also had regular calls with the counsel to the NCSG to discuss issues that are common to all the states.

### **EVALUATING APPLICANT'S SERVICES**

25. Applicant respectfully submits that its request for the fifth interim allowance of compensation is reasonable and appropriate. The services rendered by Applicant, as highlighted above, required substantial time and effort.

26. Bankruptcy Code section 331 provides for interim compensation of professionals and incorporates the substantive standards of Bankruptcy Code section 330 to govern the Court's award of such compensation. Bankruptcy Code section 330 provides that a court may award a professional employed under Bankruptcy Code section 327 "reasonable compensation for actual, necessary services rendered ... and reimbursement for actual, necessary expenses." Bankruptcy Code section 330 also sets forth the criteria for the award of such compensation and reimbursement.

27. In determining the amount of reasonable compensation to be awarded, the Court should consider the nature, extent, and the value of such services, taking into account all relevant factors, including:

- a. the time spent on such services;
- b. the rates charged for such services;
- c. whether the services were necessary to the administration of, or beneficial at the time at which the service was rendered toward the completion of, a case under this title;

- d. whether the services were performed within a reasonable amount of time commensurate with the complexity, importance, and nature of the problem, issue, or task addressed; and
- e. whether the compensation is reasonable based on the customary compensation charged by comparably skilled practitioners in cases other than cases under this title.

28. Applicant respectfully submits that the services for which it seeks compensation in this Application were necessary for and beneficial to the AHC, the Debtors, the Debtors' estates, and other parties in interest. Applicant also submits that the services rendered to the AHC were performed economically, effectively and efficiently and were necessary. Applicant further submits that the compensation requested herein is reasonable in light of the nature, extent and value of such services and that the fees billed and expenses incurred were well within the parameters of the budget provided to the Debtors, which estimated monthly fees of \$200,000.

29. Applicant coordinated with co-counsel to the AHC to assign tasks and avoid duplication of services. Certain services, such as participation in court hearings, conference calls and meetings and review of pertinent documents, necessarily required the involvement of multiple co-counsel advising the AHC. Applicant was primarily responsible for interfacing with the state members of the AHC and bringing such issues and concerns to the remainder of the AHC and other co-counsel.

30. Applicant's hourly rates and fees charged are consistent with the market rate for comparable services. As set forth in the Cyganowski Certification, the hourly rates and fees charged by Applicant are the same as those generally charged to, and paid by, Applicant's other clients. In accordance with its regular practice, Applicant's hourly rates are reviewed and adjusted in October of each year.

31. Applicant, to the best of its knowledge, has not included in its request for interim fees any Allocation Fees.

32. In summary, the services rendered by Applicant were necessary and beneficial to the AHC and the Debtors' estates, and were consistently performed in a timely manner commensurate with the complexity, importance, novelty and nature of the issues involved. Accordingly, approval of the compensation sought herein is warranted.

### **DISBURSEMENTS**

33. Applicant incurred actual and necessary out-of-pocket expenses during the Application Period, which are set forth in Exhibit G. By this Application, Applicant respectfully requests allowance of such reimbursement in full. The disbursements for which Applicant seeks reimbursement are as follows:

- a. Computer Research Charges – Otterbourg's practice is to bill clients for electronic research at actual cost, which does not include amortization for maintenance and equipment.

### **APPLICANTS' STATEMENT PURSUANT TO APPENDIX B OF THE UST GUIDELINES**

34. The following statement is provided pursuant to § C.5. of the UST Guidelines.

- a. **Question:** Did you agree to any variations from, or alternatives to, your standard or customary billing rates, fees or terms of services pertaining to this engagement that were provided during the application period? If so, please explain.

**Answer:** No.

- b. **Question:** If the fees sought in this fee application as compared to the fees budgeted for the time period covered by this fee application are higher by 10% or more, did you discuss the reasons for the variation with the client?

**Answer:** The fees sought in the Application do not exceed the fees budgeted for the Application Period and are, in fact, considerably less than the amount budgeted.

- c. **Question:** Have any of the professionals included in this fee application varied their hourly rate based on the geographic location of the bankruptcy case?

**Answer:** No.

- d. **Question:** Does the fee application include time or fees related to reviewing or revising time records or preparing, reviewing, or revising invoices? (This is limited to work involved in preparing and editing billing records that would not be compensable outside of bankruptcy and does not include reasonable fees for preparing a fee application.) If so, please quantify by hours and fees.

**Answer:** Yes. There were 3.3 hours (\$2,227.50) recorded for reviewing fee time.

- e. **Question:** Does this fee application include time or fees for reviewing time records to redact any privileged or other confidential information? If so, please quantify by hours and fees.

**Answer:** No.

- f. **Question:** If the fee application includes any rate increases since retention: (i) Did your client review and approve those rate increases in advance? (ii) Did your client agree when retaining the law firm to accept all future rate increases? If not, did you inform your client that they need not agree to modified rates or terms in order to have you continue the representation, consistent with ABA Formal Ethics Opinion 11-458?

**Answer:** Pursuant to Applicant's ordinary practices, hourly billable rates were increased in October 2020. Applicant was not subject to a separate retention application. The Debtors were authorized to pay the fees of Applicant pursuant to the Fee Assumption Order. The increase in Otterbourg's hourly rate was disclosed to the AHC in Otterbourg's October 2020 monthly statement and reviewed by the AHC prior to filing with the Court.

### **CONCLUSION**

**WHEREFORE**, the Applicant respectfully requests that this Court enter an order (i) (a) allowing on an interim basis compensation in the aggregate amount of \$683,168.00 for fees for services rendered during the Application Period; (b) allowing on an interim basis actual, necessary expenses incurred in connection with such services in the aggregate amount of \$887.21; (c) authorizing and directing the Debtors to pay to the unpaid fees for services rendered



during the Application Period expenses associated with such services; and (ii) granting such other and further relief as may be just or proper.

New York, New York  
Dated: July 15, 2021

OTTERBOURG P.C.

By: /s/ Melanie L. Cyganowski

Melanie L. Cyganowski, Esq.

Jennifer S. Feeney, Esq.

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# **EXHIBIT A**

## **Certification**

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Jennifer S. Feeney, Esq.  
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UNITED STATES BANKRUPTCY COURT  
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In re : Chapter 11  
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PURDUE PHARMA L.P., *et al.*, : Case No. 19-23649 (RDD)  
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Debtors<sup>1</sup>. : (Jointly Administered)  
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**CERTIFICATION OF MELANIE L. CYGANOWSKI IN RESPECT OF APPLICATION  
OF OTTERBOURG P.C. AS CO-COUNSEL TO THE AD HOC COMMITTEE OF  
GOVERNMENTAL AND OTHER CONTINGENT CLAIMANTS FOR  
FIFTH INTERIM ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED  
AND REIMBURSEMENT OF EXPENSES INCURRED FROM  
JANUARY 1, 2021 THROUGH AND INCLUDING MAY 31, 2021**

I, Melanie L. Cyganowski, hereby certify that:

1. I am a member of the firm of Otterbourg P.C. ("Otterbourg"). By Order of the  
Court, dated December 2, 2019, the Debtor was authorized to pay fees and expenses of

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<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtors' registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF L.P. (0495), SVC Pharma L.P. (5717) and SVC Pharma Inc. (4014). The Debtors' corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

Otterbourg as Co-Counsel to the Ad Hoc Committee of Governmental and Other Contingent Claimants *nunc pro tunc* to September 16, 2019 (the “Petition Date”). [553]

2. I am the professional designated by Otterbourg with the responsibility for compliance with the *Amended Guidelines for Fees and Disbursements for Professionals in Southern District of New York Bankruptcy Cases* (as updated June 17, 2013) (the “Local Guidelines”), and the *Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under United States Code by Attorneys in Larger Chapter 11 Cases*, adopted by the Executive Office for the United States Trustee (the “UST Guidelines”, and together with the Local Guidelines, the “Guidelines”) and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals*, [Dkt. No. 529] (the “Interim Compensation Order”).

3. This Certification is made in support of Otterbourg’s fifth interim application (the “Interim Fee Application”) for the interim allowance of compensation for services rendered and reimbursement of expenses incurred for the period from January 1, 2021 through and including May 31, 2021 (the “Application Period”).

4. I have reviewed the Interim Fee Application.

5. To the best of my knowledge, information and belief formed after reasonable inquiry of the Otterbourg accounting personnel and legal and paraprofessional staff, the Interim Fee Application complies with the mandatory guidelines set forth in the Guidelines.

6. The fees and disbursements sought are billed at rates and in accordance with practices customarily employed by Otterbourg and generally accepted by Otterbourg’s clients.

7. To the best of my knowledge, information and belief formed after reasonable inquiry of the Otterbourg personnel, Otterbourg does not make a profit in connection with any disbursements sought in the Interim Fee Application except (i) in recording certain

disbursements, for administrative convenience, charges are rounded up to the nearest dollar (*e.g.*, long distance telephone calls); (ii) volume discounts, if any, are not reflected (*e.g.*, Federal Express); and (iii) certain estimates for expenses related to various disbursements are not specifically calculated (*e.g.*, taxes, rental charges and related costs of Westlaw).

8. To the best of my knowledge, information and belief formed after reasonable inquiry of the Otterbourg accounting personnel, Otterbourg does not include in the amount of any disbursements the amortization of the cost of any investment, equipment or capital outlay.

9. To the best of my knowledge, information and belief formed after reasonable inquiry of the Otterbourg accounting personnel, to the extent that Otterbourg has purchased or contracted for services from a third party, reimbursement is sought only for the amount billed by the third party to Otterbourg and paid.

10. Otterbourg maintains supporting documentation for each item for which reimbursement is sought (*e.g.*, conference calls, meals chargeable and transportation) and such documentation is available for review on request by the Court or the United States Trustee.

11. Otterbourg has complied with the provisions requiring it to provide the United States Trustee for the Southern District of New York and the Debtor with a statement of the Applicant's fees and expenses.

12. The Notice Parties (as defined in the Interim Compensation Order) will each be provided with a copy of the Interim Fee Application.

New York, New York  
Dated: July 15, 2021

By: /s/ Melanie L. Cyganowski  
Melanie L. Cyganowski  
230 Park Avenue  
New York, New York 10169  
(212) 661-9100  
*Co-Counsel to the Ad Hoc Committee of  
Governmental and Other Contingent  
Litigation Claimants*

# **EXHIBIT B**

**Fee Assumption Order**

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

**In re:**

**PURDUE PHARMA L.P., *et al.*,  
  
Debtors.<sup>1</sup>**

**Chapter 11**

**Case No. 19-23649 (RDD)**

**(Jointly Administered)**

**ORDER AUTHORIZING THE DEBTORS TO ASSUME THE REIMBURSEMENT  
AGREEMENT AND PAY THE FEES AND EXPENSES OF THE AD HOC  
COMMITTEE'S PROFESSIONALS**

Upon the motion (the “**Motion**”)<sup>2</sup> of Purdue Pharma L.P. and its affiliates that are debtors and debtors in possession in these cases (collectively, the “**Debtors**”), pursuant to sections 105(a), 363(b) and 365 of title 11 of the United States Code (the “**Bankruptcy Code**”), for an order (this “**Order**”) (a) authorizing the Debtors to assume the Reimbursement Agreement, attached to the Motion as **Exhibit B**, and (b) authorizing but not directing the Debtors to pay the reasonable and documented fees and expenses under the Reimbursement Agreement, without the need for further motion, fee application or order of the Court, as more fully set forth in the Motion; and the Court having jurisdiction to decide the Motion and the relief requested therein in accordance with 28 U.S.C. §§ 157(a)-(b) and 1334(b) and the Amended Standing Order of Reference M-431, dated January 31, 2012 (Preska, C.J.); and consideration of the Motion and the requested relief being a

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<sup>1</sup> The Debtors in these cases, along with the last four digits of each Debtor’s registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717) and SVC Pharma Inc. (4014). The Debtors’ corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

<sup>2</sup> Capitalized terms used but not otherwise defined herein shall have the respective meanings ascribed to such terms in the Motion.

core proceeding pursuant to 28 U.S.C. § 157(b); and venue being proper before the Court pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the relief requested in the Motion having been provided, such notice having been adequate and appropriate under the circumstances, and it appearing that no other or further notice need be provided; and upon the objections (or joinders to objections) to the relief requested in the Motion filed by the Ad Hoc Group of Individual Victims, the NAS Babies Ad Hoc Committee, the Official Committee of Unsecured Creditors, the Private Insurance Plaintiffs, the U.S. Trustee, and Certain Native American Tribes [Docket Nos. 454, 458, 459, 462, 463 and 468] and the responses thereto; and the Court having held a hearing to consider the relief requested in the Motion on November 19, 2019 (the “**Hearing**”); and upon the record of the Hearing and all of the proceedings had before the Court; and after due deliberation and for the reasons stated by the Court in its bench ruling at the Hearing the Court having determined that the legal and factual bases set forth in the Motion establish good and sufficient cause for the relief granted herein, which is in the best interests of the Debtors, their estates, their creditors and all parties in interest; now, therefore,

**IT IS HEREBY ORDERED THAT:**

1. The Motion is granted to the extent set forth herein.
2. The Debtors are authorized to perform the Reimbursement Agreement pursuant to section 363 of the Bankruptcy Code, subject to and as modified by the terms of this Order.
3. Specifically, the Debtors are authorized, but not directed, to pay (i) Brown Rudnick LLP, (ii) Gilbert, LLP, (iii) Kramer Levin Naftalis & Frankel LLP, (iv) Otterbourg PC, (v) FTI Consulting, Inc., (vi) Compass Lexecon and (vii) Coulter & Justice (collectively, the “**Professionals**”) for their reasonable and documented fees and expenses in accordance with the terms and conditions of the Reimbursement Agreement and this Order; *provided* that, for the avoidance of doubt, the Debtors shall have no obligation to pay any fees, expenses or other



amounts incurred after the termination of the Reimbursement Agreement in accordance with its terms.

4. The authorization of the Debtors to pay (i) the reasonable and documented fees and expenses of the Professionals (other than those Professionals set forth in paragraph 3(vi) and (vii) above, which are addressed in subsection (z) of this paragraph 4 below) and (ii) reasonable and documented expenses (e.g., hotels, meals, travel costs, etc., but excluding the fees and expenses of any professional, including internal counsel, retained or employed by any Ad Hoc Committee member) incurred by the Ad Hoc Committee members in furtherance of their service on the Ad Hoc Committee (the “**Member Expenses**”) shall be subject, *mutatis mutandis*, to the procedures with respect to authorization of payment of the fees and expenses of the professionals of the Debtors and the UCC set forth in the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals* [Docket No. 529] (as may be modified or amended by any subsequent order of the Court with respect thereto, the “**Interim Compensation Order**”) including, for the avoidance of doubt, the filing of Monthly Fee Statements and Applications (in each case as defined in the Interim Compensation Order), Interim Fee Hearings (as defined in the Interim Compensation Order), the expiration of the Objection Deadline (as defined in the Interim Compensation Order) or resolution of any Objections (as defined in the Interim Compensation Order) with respect each Monthly Fee Statement, and the 20% holdback with respect to fees until further order of the Court; *provided* that the standard for authorization of payment of the fees and expenses of the Professionals shall be whether such fees and expenses are (a) reasonable and documented and (b) reimbursable under the Reimbursement Agreement (including, without limitation, that such fees and expenses are not duplicative of other Professionals and are within the Scope (as defined in the Reimbursement Agreement)); *provided*

*further* that, for the avoidance of doubt, that the Professionals shall not be considered retained professionals of the Debtors or UCC and the retention of the Professionals shall not be required to satisfy the standards for retention set forth in sections 327-328 or 1103 of the Bankruptcy Code; *provided further* that, the Professionals shall seek reimbursement only for fees and expenses that are within the Scope (and, for the avoidance of doubt, neither filing objections to the claims of other creditors or advancing or prosecuting the claims of the individual members of the Ad Hoc Committee shall be considered within the Scope); *provided further* that, (x) the aggregate amount authorized to be paid pursuant to this Order shall not exceed \$1,500,000 with respect to the fees and expenses of the Professionals (including Compass Lexecon and Coulter & Justice) incurred prior to the Petition Date, (y) such prepetition fees and expenses of the Professionals, together with any prepetition Member Expenses, shall be sought only upon the earlier of (1) the execution of a restructuring support agreement among parties including the Debtors and each member of the Ad Hoc Committee and (2) confirmation of a chapter 11 plan for the Debtors, and (z) the Debtors shall not be authorized to pay any amounts to the Professionals set forth in paragraph 3(vi) and 3(vii) above (who are not currently actively engaged) unless and until authorized to do so by subsequent order of this Court in connection with one of the Applications referred to above; *provided further* that the fees and expenses of the Professionals incurred in connection with or relating to the allocation of value among the Debtors' creditors (the "**Allocation Fees**"), shall be segregated and recorded in separate matters or projects and shall be sought by Application only upon the earlier of (a) the approval by the Court of a restructuring support agreement among parties including the Debtors and each member of the Ad Hoc Committee (the "**RSA**") or (b) confirmation of a chapter 11 plan for the Debtors; *provided further* that to the extent an emergency relief fund for the use, prior to confirmation, of a substantial amount of the Debtors' cash to provide emergency relief and

assistance with respect to the opioid crisis (an “**ERF**”) has not previously been sought or approved by the Court, the RSA shall have within it a valid and credible proposal for an ERF; *provided further* that prior to the earlier of approval by the Court of an RSA or confirmation of a chapter 11 plan for the Debtors, each Professional that submits a Monthly Fee Statement or Application will include a representation therein that it has separately recorded its Allocation Fees and has not, to the best of its knowledge, included Allocation Fees in such Monthly Fee Statement or Application.

5. Notwithstanding anything to the contrary herein, the Debtors shall not be authorized to pay the fees and any expenses of any advisor to the Ad Hoc Committee other than the Professionals (as defined in paragraph 3), and the authorization to pay the fees and expenses of any advisor to the Ad Hoc Committee other than the Professionals (including any investment banker, as contemplated by the Reimbursement Agreement) shall be sought by a supplemental motion to this Court, *provided* that the Debtors are authorized to pay the fees of an investment banker, as contemplated by the Reimbursement Agreement, subject the same procedures applicable to the Professionals (as defined in paragraph 3), with the consent of the Debtors, U.S. Trustee and UCC to the retention of such investment banker and the terms of such retention.

6. Pursuant to and consistent with information and confidentiality protocols to be agreed between the Ad Hoc Committee, the Ad Hoc Group of Non-Consenting States<sup>3</sup> and the Governmental Entities Group<sup>4</sup>, and acceptable to the Debtors, and any protective order in these cases, the work product of certain financial professionals engaged by the Ad Hoc Committee, including FTI Consulting, Inc., shall be made available to the Ad Hoc Group of Non-Consenting States and the Governmental Entities Group with respect to matters on which such parties share a

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<sup>3</sup> The Bankruptcy Rule 2019 statement for the Ad Hoc Group of Non-Consenting States is filed at Docket No. 296.

<sup>4</sup> The Bankruptcy Rule 2019 statement for the Governmental Entities Group is filed at Docket No. 409.

common interest, subject to the terms therein, and where such work product does not contain, reflect or reference confidential information of the Debtors that they have provided to the Ad Hoc Committee but not provided to the Ad Hoc Group of Non-Consenting States and the Governmental Entities Group. The delivery of information pursuant to such information protocols described in this paragraph shall not be deemed a waiver of any common interest privilege, attorney-client privilege, work product protection, or any other applicable privileges or protections with respect thereto.

7. The contents of the Motion and the notice procedures set forth therein constitute good and sufficient notice and satisfy the Bankruptcy Rules and the Local Rules, and no other or further notice of the Motion or the entry of this Order shall be required.

8. Nothing in this Order shall be deemed to constitute (i) a grant of third-party beneficiary status or bestowal of any additional rights on any third party or (ii) a waiver of any rights, claims or defenses of the Debtors.

9. The Debtors are authorized to take all actions necessary to effectuate the relief granted pursuant to this Order in accordance with the Motion.

10. The relief granted herein shall be binding upon any chapter 11 trustee appointed in any of these chapter 11 cases or upon any chapter 7 trustee appointed in the event of a subsequent conversion of any of these chapter 11 cases to cases under chapter 7.

11. The Court retains jurisdiction with respect to all matters arising from or related to the implementation of this Order.

Dated: December 2, 2019  
White Plains, New York

/s/ Robert D. Drain  
THE HONORABLE ROBERT D. DRAIN  
UNITED STATES BANKRUPTCY JUDGE

# **EXHIBIT C**

## **Summary of Compensation By Project Code**

**SUMMARY OF COMPENSATION BY  
PROJECT CODE FOR THE APPLICATION PERIOD**

<b>Project Code</b>	<b>Project Category</b>	<b>Total Billed Hours</b>	<b>Average Hourly Rate</b>	<b>Fees Recorded</b>
PU01	Asset Analysis and Recovery	4.2	\$1,171.55	\$4,920.50
PU04	Case Administration	29.9	\$1,156.79	\$34,588.00
PU05	Claims Analysis	14.5	\$1,083.07	\$15,704.50
PU06	Employment and Fee Applications	29.3	\$615.72	\$18,040.50
PU08	Litigation: Contested Matters, Adversary	9.5	\$1,187.37	\$11,280.00
PU09	Meetings and Communications with Ad Hoc	65.0	\$1,204.20	\$78,273.00
PU11	Plan and Disclosure Statement	422.9	\$1,230.46	\$520,361.50
	<b>TOTALS:</b>	<b>575.3</b>	<b>\$1,187.50</b>	<b>\$683,168.00</b>

**BUDGET V. ACTUAL FEES REQUESTED**

<b>Project Code</b>	<b>Project Category</b>	<b>Budgeted Hours</b>	<b>Actual Hours</b>	<b>Budgeted Fees</b>	<b>Actual Fees</b>
PU01	Asset Analysis and Recovery	20	4.2	\$25,000.00	\$4,920.50
PU02	Assumption and Rejection of Leases and Contract	0	0	\$0	\$0.00
PU03	Business Operations	20	0	\$20,000.00	\$0.00
PU04	Case Administration	100	29.9	\$125,000.00	\$34,588.00
PU05	Claims Analysis	60	14.5	\$75,000.00	\$15,704.50
PU06	Employment and Fee Applications	55	29.3	\$40,000.00	\$18,040.50
PU07	Emergency Financing	0	0	\$0	\$0.00
PU08	Litigation: Contested Matters, Adversary	35	9.5	\$40,000.00	\$11,280.00
PU09	Meetings and Communications with Ad Hoc	140	65.0	\$175,000.00	\$78,273.00
PU10	Non-Working Travel	0	0	\$0	\$0.00
PU11	Plan and Disclosure Statement	400	422.9	\$500,000.00	\$520,361.50
<b>TOTAL:</b>		<b>830.0</b>	<b>575.3</b>	<b>\$1,000,000.00</b>	<b>\$683,168.00</b>

**PROPOSED STAFFING PLAN APPLICATION PERIOD**

<b>Category of Timekeeper</b>	<b>Estimated Number of Timekeepers</b>	<b>Actual Number of Timekeepers</b>	<b>Average Hourly Rate Based on Actual Timekeepers</b>
Partner	1	1	\$1400.00
Of Counsel	1	1	\$895.00
Associate	1	1	\$675.00
Paralegal	1	1	\$325.00

# **EXHIBIT D**

## **Summary of Hours By Professional**



**SUMMARY OF HOURS BILLED BY  
PROFESSIONALS FOR THE APPLICATION PERIOD**

**Attorney Hours for the Application Period**

<b>Professional</b>	<b>Year Admitted</b>	<b>Rate Per Hour</b>	<b>No. of Hours</b>	<b>Total Compensation</b>
Melanie L. Cyganowski ("MLC") Partner	1982	\$1400.00	357.3	\$500220.00
Jennifer S. Feeney ("JSF") Of Counsel	1998	\$895.00	183.4	164143.00
Robert C. Yan ("RCY") Associate	2002	\$675.00	21.6	14580.00
	<b>TOTAL</b>		<b>562.3</b>	<b>\$678,943.00</b>

**Paraprofessional Hours for the Application Period**

<b>Professional</b>	<b>Year Admitted</b>	<b>Rate Per Hour</b>	<b>No. of Hours</b>	<b>Total Compensation</b>
Jessica K. Hildebrandt ("JKH") Paralegal	N/A	\$325.00	13.0	\$4,225.00
	<b>TOTAL</b>		<b>13.0</b>	<b>\$4,225.00</b>

**Total Fees for the Application Period By Position**

<b>Professional</b>	<b>Blended Rate</b>	<b>Total Hrs.</b>	<b>Total Fees Recorded</b>
Partner	\$1400.00	357.3	\$500,220.00
Of Counsel	\$895.00	183.4	\$164,143.00
Associate	\$675.00	21.6	\$14,580.00
Paralegal	\$325.00	13.0	\$4,225.00
<b>Blended Professional Rate</b>	<b>\$1,187.50</b>	<b>575.3</b>	<b>\$683,168.00</b>

**Blended Hourly Rate for Professionals Billing to Case v. Blended Hourly Rate of All Other Professionals for Last 12 Months**

<b>Professionals and Paraprofessionals</b>	<b>Blended Hourly Rate of Professionals and Paraprofessionals Not Billing to this Matter for Prior 12-Month Period by Position</b>	<b>Blended Hourly Rate of Professionals Billed for Application Period by Position</b>
Partner	\$963.98	\$1,400.00
Of Counsel	\$802.01	\$895.00
Associate	\$455.44	\$675.00
Paraprofessional and Other Staff	\$310.00	\$325.00
Blended Attorney Rate/Total Attorney Fees	\$783.17	\$1,187.50
Blended Paralegal Rate	\$310.00	\$325.00

# **EXHIBIT E**

## **Time Entries**

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter No.: 20186/0002  
Matter Name: CHAPTER 11  
Billing Partner: RL STEHL

July 14, 2021  
BILL NO. 217695

For Services Rendered Through May 31, 2021:

Phase: PU01		ASSET ANALYSIS AND RECOVERY	
<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
01/06/21 JSF	Examine Documents Review of Stipulation re: Standing to Assert Insurance Claims	.30	268.50
01/19/21 JSF	Examine Documents Review of Debtors' Response in Support of Insurance Stipulation	.40	358.00
01/19/21 JSF	Examine Documents Review of Media Intervenors' Reply in Support of Unsealing Sackler Documents	.30	268.50
01/19/21 MLC	Analysis of Memorandum Reviewed and analyzed debtors' response in support of insurance stipulation	.60	840.00
01/26/21 JSF	Examine Documents Review of Draft Complaint for Declaratory Relief re: Insurance Coverage	.50	447.50

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 2

July 14, 2021  
BILL NO. 217695

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
02/08/21 JSF	Examine Documents Review of Sackler Family Objections to Media Intervenor Request for Unseal Records	.40	358.00
02/08/21 MLC	Analysis of Memorandum Reviewed objection pleading filed by Sackler Family in response to request by Media Intervenor to unseal certain documents	.70	980.00
03/17/21 MLC	Examine Documents Review of media motion to unseal certain Sackler documents and Sackler parties ' response	1.00	1,400.00
TOTAL PHASE PU01		4.20	\$4,920.50

Phase: PU04

CASE ADMINISTRATION

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
01/06/21 MLC	Analysis of Memorandum Review of stipulation between AHC, UCC and debtors re certain standing issues to assert insurance claims on behalf of Purdue Pharma	.50	700.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 3

July 14, 2021  
BILL NO. 217695

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
01/20/21 JSF	Telephone Call(s) Participate in Omnibus Court Hearing (JSF portion)	3.10	2,774.50
01/20/21 JSF	Examine Documents Prepare for Court Hearing - Review of Motions and Responsive Pleadings on for Hearing	1.20	1,074.00
01/20/21 MLC	Court Appearance - General Attended court hearing re various pending motions	4.50	6,300.00
01/28/21 MLC	Correspondence Correspondence re scheduling of monitor interviews and selection	.40	560.00
01/29/21 MLC	Correspondence Correspondence with counsel (AHC/Debtors/NCSG/UCC) re monitor selection process and candidates	.80	1,120.00
01/30/21 MLC	Correspondence Correspondence among counsel (AHC/NCSG/Debtors/UCC) re monitor interviews and selection process	.90	1,260.00
02/02/21 MLC	Conference call(s) Participation in interviews of potential monitors	1.00	1,400.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 4

July 14, 2021  
BILL NO. 217695

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
02/05/21 MLC	Conference call(s) Conference call meeting to review the interviews of the candidates for monitor	1.00	1,400.00
02/17/21 JSF	Examine Documents Prepare for Omnibus Hearing - Review of Motions (Sacklers and Media Unsealing Motions) for Omnibus Hearing	.40	358.00
02/17/21 JSF	Examine Documents Participate in Omnibus Court Hearing	3.00	2,685.00
02/17/21 MLC	Court Appearance - General Listened to court hearing re various pending motions	3.10	4,340.00
02/26/21 MLC	Analysis of Memorandum Review of debtors' motion for exclusivity extension	.50	700.00
03/16/21 MLC	Correspondence Correspondence among Otterbourg team re filing of interim fee application	.30	420.00
04/06/21 JSF	Telephone Call(s) Participate/Listen to Omnibus Hearing on NAS Motion and Insurance Adversary	2.00	1,790.00
04/21/21 JSF	Examine Documents Review of Case Updates and Recently Filed Motions for Hearing	1.20	1,074.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 5

July 14, 2021  
BILL NO. 217695

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/21/21 JSF	Examine Documents Participate Telephonically in Omnibus Court Hearing	1.50	1,342.50
04/21/21 MLC	Court Appearance - General Attended omnibus hearing	2.50	3,500.00
04/29/21 JSF	Examine Documents Review of UST Settlements with 3 Law Firms re: Disclosure Issues	.30	268.50
05/20/21 JSF	Telephone Call(s) Participate in Omnibus Hearing re: Status and Other Pending Matters	1.50	1,342.50
05/21/21 JSF	Examine Documents Review of Case Updates to AHC	.20	179.00
TOTAL PHASE PU04		29.90	\$34,588.00

Phase: PU05

CLAIMS ANALYSIS

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
01/04/21 JSF	Examine Documents Review of States' Claims and Issues Being Analyzed by Debtor	3.20	2,864.00



OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 6

July 14, 2021  
BILL NO. 217695

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
01/04/21 MLC	Correspondence Correspondence with Troop re status of Cornerstone's analysis of States' claims	.30	420.00
01/05/21 JSF	Examine Documents Examine POC Filed by States and Review of Issues Under Review by Debtors	2.20	1,969.00
01/13/21 JSF	Examine Documents Review of Summmary of Debtors' Financial Advisors Review of State Claims Work	1.60	1,432.00
01/13/21 JSF	Examine Documents Attention to States' Claim and Issues Related to Debtors' Review	1.80	1,611.00
01/13/21 MLC	Analysis of Memorandum Review and analysis of summary of debtors' financial advisors review of state claims work	2.30	3,220.00
01/13/21 MLC	Examine Documents Reviewed documents related to the States' claim in connection with the Debtors' analysis of the consolidated POC	1.10	1,540.00
04/15/21 MLC	Analysis of Memorandum Review and analysis of Joint Objection of Distributors, Manufacturers and Pharmacies to Debtors' Motion re Omnibus Claims Objection Procedures	.90	1,260.00

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NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 7

July 14, 2021  
BILL NO. 217695

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/30/21 JSF	Examine Documents Review of States' Consolidated Proof of Claim re: State Request	.30	268.50
04/30/21 MLC	Correspondence Correspondence with state group re medicaid breakdown in consolidated proof of claim	.30	420.00
04/30/21 MLC	Correspondence Correspondence with Brattle re medicaid breakdown by states in consolidated proof of claim	.30	420.00
05/01/21 MLC	Correspondence Correspondence with Brattle re medicaid allocation breakouts by state	.20	280.00
TOTAL PHASE PU05		14.50	\$15,704.50

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Phase: PU06	EMPLOYMENT & FEE APPLICATIONS
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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
02/04/21 JSF	Prepare Legal Papers Draft of Fourth Interim Fee Application	1.60	1,432.00
02/05/21 JSF	Prepare Legal Papers Draft Interim Fee Application	.60	537.00

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NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 8

July 14, 2021  
BILL NO. 217695

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
02/05/21 JKH	Review/analyze Review compensation order and calendar deadline to file fee app	.30	97.50
02/18/21 JSF	Prepare Legal Papers Preparation of Interim Fee Application	1.70	1,521.50
02/19/21 JSF	Prepare Legal Papers Prepare Interim Fee Application	2.40	2,148.00
02/19/21 JKH	Prepare Chart(s) Prepare exhibits for fee application	.20	65.00
03/01/21 RCY	Examine Documents Examine time detail for October through December monthly statement preparation and fee application.	1.20	810.00
03/01/21 JKH	Prepare Papers Prepare fee application	.60	195.00
03/02/21 RCY	Examine Documents Review time detail in preparation of October through December 2020 monthly statements.	2.10	1,417.50
03/02/21 JKH	Prepare Papers Prepare draft monthly statements	.60	195.00

OTTERBOURG P.C.  
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NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 9

July 14, 2021  
BILL NO. 217695

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
03/04/21 RCY	Examine Documents Provide comments on October through December monthly statements for finalization.	.80	540.00
03/04/21 JKH	Prepare Papers Prepare monthly fee statements for Oct. Nov. and Dec.	1.30	422.50
03/11/21 JKH	Prepare Chart(s) Prepare exhibits for fee application	.60	195.00
03/12/21 MLC	Draft/revise Final review of Otterbourg's fee application	1.00	1,400.00
03/12/21 RCY	Examine Documents Review and Finalize Fee Application and monthly statements for Filing	2.30	1,552.50
03/12/21 JKH	Prepare Papers Prepare interim fee application	3.20	1,040.00
03/15/21 JKH	Prepare Papers Revise monthly statements for Oct - Dec	.30	97.50
03/15/21 JKH	Prepare Legal Papers Edit interim fee application	.30	97.50

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NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 10

July 14, 2021  
BILL NO. 217695

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
03/16/21 JSF	Examine Documents Review of Interim Fee Application	1.20	1,074.00
03/16/21 RCY	Examine Documents Confer with JKH re: revisions to fee application	1.30	877.50
03/16/21 RCY	Examine Documents Provide comments to fee application to finalize.	.70	472.50
03/16/21 JKH	Telephone Call(s) Telephone call with RCY to discuss changes and edits to fee application	1.30	422.50
03/16/21 JKH	Prepare Papers Edit fee application and finalize for filing	2.30	747.50
03/17/21 JKH	Prepare Legal Papers Prepare monthly statements for filing	.20	65.00
03/17/21 JKH	Prepare Legal Papers Prepare fee application for filing	.30	97.50
03/24/21 JKH	Diary & Docket Review notice of hearing and calendar objection deadline re: fee application	.20	65.00

OTTERBOURG P.C.  
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NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 11

July 14, 2021  
BILL NO. 217695

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/21/21 JSF	Examine Documents Review of Proposed Fee Order and Amounts	.40	358.00
04/21/21 JKH	Review/analyze Review proposed fee order	.30	97.50
TOTAL PHASE PU06		29.30	\$18,040.50

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Phase: PU08	LITIGATION: CONTESTED MATTERS, ADVERSARY
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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
03/13/21 MLC	Analysis of Memorandum Review of debtors' motion to extend time for preliminary injunction	.60	840.00
03/19/21 JSF	Examine Documents Review of NCSG Objection to Continuation of Preliminary Injunction Against Sacklers	.40	358.00
03/23/21 JSF	Examine Documents Review of NCSG Objection to Extension of Injunction	.30	268.50
03/23/21 JSF	Examine Documents Review of UCC Statement in Support of Continuation of Injunction	.20	179.00

OTTERBOURG P.C.  
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NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 12

July 14, 2021  
BILL NO. 217695

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
03/23/21 JSF	Examine Documents Review of AHC Statement in Support of Continuation of Injunction	.20	179.00
03/23/21 JSF	Examine Documents Review of Debtors' Response to Objections to Motion for Continuation of Injunction	.40	358.00
03/24/21 JSF	Telephone Call(s) Participate in Court Hearing re: Extension of Preliminary Injunction	2.20	1,969.00
04/06/21 MLC	Court Appearance - General Pre-trial proceeding in Insurance Adversary	2.20	3,080.00
04/06/21 MLC	Examine Documents Reviewed summary of proceedings re adversary proceeding hearing	.30	420.00
04/16/21 JSF	Examine Documents Review of NCSG Objection to Continuation of Preliminary Injunction	.30	268.50
04/30/21 MLC	Correspondence Correspondence from Gilbert firm summarizing upcoming arguments in insurance adversary proceeding	.40	560.00

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NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 13

July 14, 2021  
BILL NO. 217695

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/30/21 MLC	Analysis of Memorandum Review of draft response by Gilbert firm re certain jurisdictional issues raised in adversary proceeding	.60	840.00
05/18/21 MLC	Conference call(s) Conference call with NCSG and AHC counsel re response to discovery by School Districts	.80	1,120.00
05/18/21 MLC	Conference call(s) Conference call with States subgroup and counsel re discovery requests by School Districts	.60	840.00
TOTAL PHASE PU08		9.50	\$11,280.00

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Phase: PU09 MEETINGS & COMMUNICATIONS W/ AD HOC

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
01/05/21 MLC	Conference call(s) Conference call with AHC subcommittee re status of various negotiations	.50	700.00
01/06/21 JSF	Telephone Call(s) Participate in Weekly Update Call with Full AHC and Counsel	.80	716.00



OTTERBOURG P.C.  
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NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 14

July 14, 2021  
BILL NO. 217695

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
01/06/21 MLC	Conference call(s) Weekly meeting AHC committee	1.10	1,540.00
01/07/21 MLC	Conference call(s) Conference call with AHC states subcommittee members re status of various negotiations and next steps	.50	700.00
01/12/21 MLC	Conference call(s) Conference call with AHC state subgroup re negotiations update	.50	700.00
01/13/21 JSF	Telephone Call(s) Participate in Weekly AHC Meeting (JSF portion)	.90	805.50
01/13/21 MLC	Conference call(s) Weekly meeting of AHC committee	1.20	1,680.00
01/14/21 MLC	Conference call(s) Conference call with AHC subcommittee re plan negotiations	.50	700.00
01/19/21 MLC	Conference call(s) Conference call meeting with AHC States subcommittee to review status of various pending matters	.60	840.00
01/20/21 JSF	Telephone Call(s) Participate in Weekly Conference Update with AHC and Professionals	1.20	1,074.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 15

July 14, 2021  
BILL NO. 217695

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
01/20/21 MLC	Conference call(s) Weekly AHC meeting with committee and professionals	1.30	1,820.00
01/21/21 MLC	Conference call(s) Conference call with AHC states' subcommittee re status of plan negotiations	.50	700.00
01/22/21 MLC	Conference call(s) Conference call with AHC States representatives re negotiations	.50	700.00
01/27/21 JSF	Telephone Call(s) Participate in Weekly Meeting of Ad Hoc Committee	1.20	1,074.00
01/27/21 MLC	Conference call(s) Conference call with AHC	1.40	1,960.00
02/02/21 JSF	Telephone Call(s) Participate in Call with Full AHC to Review Status of Discussions and Settlements on Plan Terms	1.30	1,163.50
02/02/21 MLC	Conference call(s) Meeting with AHC to review Sackler proposal and counter negotiations	1.50	2,100.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 16

July 14, 2021  
BILL NO. 217695

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
02/10/21 JSF	Telephone Call(s) Participate in AHC Weekly Update Meeting re: Plan and Other Open Issues	1.70	1,521.50
02/10/21 MLC	Conference call(s) Weekly conference call with AHC and professionals re plan and sale discussion	1.80	2,520.00
02/17/21 JSF	Telephone Call(s) Participate in Weekly Update Conference Call with Full AHC and Professionals	1.00	895.00
02/17/21 MLC	Conference call(s) Weekly meeting with AHC committee and professionals	1.10	1,540.00
02/23/21 MLC	Conference call(s) Conference call with states subcommittee re plan open issues	.60	840.00
02/24/21 MLC	Conference call(s) Weekly meeting with AHC committee and professionals	1.80	2,520.00
02/25/21 MLC	Conference call(s) Conference call with States subgroup re plan negotiations	.60	840.00
02/25/21 MLC	Conference call(s) Conference call with States subgroup re reviewing the plan provisions in detail	2.00	2,800.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 17

July 14, 2021  
BILL NO. 217695

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
02/26/21 RCY	Telephone Call(s) Professionals' call with States to discuss next steps.	.70	472.50
03/03/21 MLC	Conference call(s) Conference call weekly meeting with AHC	1.70	2,380.00
03/03/21 RCY	Telephone Call(s) Participate in weekly call with AHC.	1.60	1,080.00
03/09/21 MLC	Conference call(s) Biweekly call with mediation subgroup re plan amendments	.60	840.00
03/10/21 JSF	Telephone Call(s) Participate in Weekly Update Call with AHC	1.00	895.00
03/10/21 MLC	Conference call(s) Participated in weekly update call with AHC	1.00	1,400.00
03/10/21 MLC	Correspondence Correspondence among AHC counsel in preparation for AHC meeting	.30	420.00
03/15/21 MLC	Conference call(s) Conference call with AHC re status of plan negotiations with various parties	1.00	1,400.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 18

July 14, 2021  
BILL NO. 217695

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
03/15/21 MLC	Conference call(s) Follow up conference call with AHC re continuing negotiations with various third parties	1.00	1,400.00
03/17/21 JSF	Telephone Call(s) Participate in Weekly Update Call with Full AHC and Professionals	1.30	1,163.50
03/17/21 JSF	Examine Documents Prepare for AHC Call - Updates to Committe	.30	268.50
03/17/21 MLC	Prepare for Meeting Prepared for weekly meeting with AHC	.80	1,120.00
03/17/21 MLC	Conference call(s) Weekly meeting with AHC	1.40	1,960.00
03/24/21 JSF	Telephone Call(s) Participate in Weekly AHC Call with Professionals and Committee	.90	805.50
03/31/21 JSF	Telephone Call(s) Participate in Weekly Meeting of AHC	1.00	895.00
03/31/21 MLC	Conference call(s) Weekly conference call with AHC and counsel	1.00	1,400.00

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230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 19

July 14, 2021  
BILL NO. 217695

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/07/21 JSF	Telephone Call(s) Participate in Weekly Meeting of AHC and Professionals	1.50	1,342.50
04/07/21 MLC	Conference call(s) Attended weekly AHC meeting	1.60	2,240.00
04/07/21 MLC	Prepare for Meeting Prepared for meeting with AHC by reviewing and revising agenda	.30	420.00
04/14/21 JSF	Telephone Call(s) Weekly Conference Call with Entire AHC and Professionals - Update on Matters	1.30	1,163.50
04/14/21 MLC	Conference call(s) Weekly meeting with AHC and counsel	1.40	1,960.00
04/15/21 MLC	Conference call(s) Conference call with State subgroup and AHC counsel re plan strategy and next steps	.70	980.00
04/17/21 MLC	Correspondence Correspondence with States subcommittee re request for preparation of certain documents for distribution to states	.30	420.00
04/29/21 JSF	Telephone Call(s) Participate in Weekly Call of AHC	1.20	1,074.00

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NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 20

July 14, 2021  
BILL NO. 217695

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/29/21 MLC	Conference call(s) Weekly meeting to review status of various pending open issues	2.00	2,800.00
05/04/21 MLC	Conference call(s) Conference call with Ad Hoc counsel with certain State representatives concerning various Plan and Sackler release issues	.80	1,120.00
05/05/21 JSF	Telephone Call(s) Participate in Weekly Call of AHC	1.40	1,253.00
05/05/21 MLC	Conference call(s) Conference call meeting with AHC members and counsel	1.10	1,540.00
05/10/21 JSF	Telephone Call(s) Participate in Meeting of AHC re: Status of Plan Negotiations and Open Issues	.80	716.00
05/10/21 MLC	Conference call(s) Conference call with AHC and counsel to review objections to disclosure statement and related issues	1.80	2,520.00
05/11/21 JSF	Examine Documents Review of Update to AHC with Recently Filed Motions	.30	268.50

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NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 21

July 14, 2021  
BILL NO. 217695

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/11/21 MLC	Conference call(s) Conference call with certain State representatives to review objections to DS/POR	.80	1,120.00
05/19/21 JSF	Telephone Call(s) Participatee in Weekly Videoconference with AHC	1.10	984.50
05/19/21 MLC	Conference call(s) Conference call meeting with AHC and counsel re status of pending matters	1.20	1,680.00
05/24/21 JSF	Telephone Call(s) Participate in AHC Videoconference re: Status of Plan and Disclosure Statement	1.70	1,521.50
05/24/21 MLC	Conference call(s) Conference call with AHC Committee re plan components and open issues	2.00	2,800.00
TOTAL PHASE PU09		65.00	\$78,273.00

Phase: PU11

PLAN & DISCLOSURE STATEMENT

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
01/04/21 JSF	Examine Documents Review of DOJ Mark-Up of Plan Term Sheet	1.60	1,432.00



OTTERBOURG P.C.  
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Client/Matter: 20186/0002  
Page 22

July 14, 2021  
BILL NO. 217695

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
01/04/21 MLC	Correspondence Correspondence with public group re review of DOJ mark up of governance term sheet	.60	840.00
01/04/21 MLC	Analysis of Memorandum Review and analysis of mark-up by DOJ of draft governance term sheet	2.70	3,780.00
01/04/21 MLC	Correspondence Correspondence with working subcommittee re NAS abatement issues	.60	840.00
01/04/21 MLC	Analysis of Memorandum Review and analysis of updated AHC Financial Advisors' Economic Analysis of Future of Purdue	.50	700.00
01/05/21 JSF	Examine Documents Review of Updated AHC Financial Advisors' Economic Analysis of Future of Purdue	.60	537.00
01/05/21 MLC	Correspondence Correspondence with public government subcommittee re reviewing and responding to DOJ mark up of governance term sheet	.50	700.00
01/05/21 MLC	Review Financial Documents Review of economic analysis prepared by HL/FTI re various economic scenarios for future of Purdue	1.40	1,960.00

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Client/Matter: 20186/0002  
Page 23

July 14, 2021  
BILL NO. 217695

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
01/05/21 MLC	Analysis of Memorandum Review and analysis of mark up by NCSG re DOJ mark up of governance term sheet	1.10	1,540.00
01/05/21 MLC	Correspondence Review of response by UCC to certain sections of public entities governance term sheet	.80	1,120.00
01/06/21 JSF	Telephone Call(s) Participate in Call with AHC Mediation Group re: Plan and Post-Governance Issues	.90	805.50
01/06/21 JSF	Examine Documents Review of UCC Comments on Term Sheet and Governance Issues	.30	268.50
01/06/21 JSF	Examine Documents Review of NCSG Comments to Term Sheet re: Post-ED Structure of Purdue	.20	179.00
01/06/21 JSF	Examine Documents Review of Updated Business Analysis and Projections on Possible Sale Options	.40	358.00
01/06/21 MLC	Conference call(s) Conference call with AHC mediation subcommittee to prepare for meeting re governance issues	1.00	1,400.00

OTTERBOURG P.C.  
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Client/Matter: 20186/0002  
Page 24

July 14, 2021  
BILL NO. 217695

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
01/06/21 MLC	Correspondence Review of correspondence by tax counsel re implications of certain actions with respect to Newco	.20	280.00
01/07/21 JSF	Examine Documents Review of Correspondence with Court re: Discovery Disputes with Sacklers, UCC and NCSG	.30	268.50
01/07/21 MLC	Analysis of Memorandum Review of correspondence with court re discovery disputes with Sacklers, UCC and NCSG	.40	560.00
01/08/21 JSF	Examine Documents Review and Analysis of Status of Plan Negotiations and Open Issues	.20	179.00
01/08/21 JSF	Examine Documents Review of UCC Analysis/Plan Sensitivities re: Future Purdue Value	.50	447.50
01/08/21 MLC	Conference call(s) Conference call with AHC subcommittee re on-going negotiations	.50	700.00
01/08/21 MLC	Analysis of Memorandum Review and analysis of UCC analysis/plan sensitivities re Future Purdue Value	.80	1,120.00

OTTERBOURG P.C.  
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NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 25

July 14, 2021  
BILL NO. 217695

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
01/08/21 MLC	Analysis of Memorandum Review and analysis of status of plan negotiations and open issues	.40	560.00
01/12/21 JSF	Examine Documents Review of Debtors' Revisions to Plan Term Sheet	1.20	1,074.00
01/12/21 JSF	Examine Documents Review Summary of Private Party Proposal for Purchase of Business	.30	268.50
01/12/21 MLC	Conference call(s) Conference call mediation session with DOJ and AHC working group on governance issues	1.00	1,400.00
01/12/21 MLC	Analysis of Memorandum Review and analysis of debtors' revisions to plan term sheet	2.20	3,080.00
01/12/21 MLC	Analysis of Memorandum Reviewed and analyzed summary of private party proposal for purchase of debtors' business	.50	700.00
01/14/21 JSF	Telephone Call(s) Participate in VideoConference with Public Side and NAACP	.70	626.50

OTTERBOURG P.C.  
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NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 26

July 14, 2021  
BILL NO. 217695

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
01/14/21 JSF	Examine Documents Review of Various Plan Related Term Sheets re: Post-Effective Date Structure and Trust Mechanisms	2.20	1,969.00
01/14/21 MLC	Prepare for Meeting Conference call with NAS working group subcommittee to prepare for mediation meeting with NAS Children Ad Hoc	.50	700.00
01/14/21 MLC	Conference call(s) Conference call mediation session with NAS working group subcommittee and NAS Children Ad Hoc	1.50	2,100.00
01/14/21 MLC	Examine Documents Reviewed certain plan term sheets re the post-effective date structure and trust mechanisms	1.80	2,520.00
01/15/21 JSF	Telephone Call(s) Participate in Videoconference with Mediators, AHC and NCSG re: Plan Issues	1.00	895.00
01/15/21 JSF	Telephone Call(s) Participate in Videoconference with Mediators, DOJ, MSGE AHC and NCSG re: Plan Issues	1.20	1,074.00
01/15/21 JSF	Examine Documents Review of Correspondence Summarizing Discussions with NAS Group	.20	179.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 27

July 14, 2021  
BILL NO. 217695

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
01/15/21 JSF	Examine Documents Review of Supplemental Financial Information re: Potential Private Sale Offer	.40	358.00
01/15/21 MLC	Conference call(s) Mediation conference call session with Mediators and DOJ with AHC	2.00	2,800.00
01/15/21 MLC	Conference call(s) Mediation session with mediators and NCSG with AHC	1.00	1,400.00
01/15/21 MLC	Examine Documents Reviewed correspondence summarizing the various discussions with the NAS Group	.50	700.00
01/15/21 MLC	Review Financial Documents Reviewed and studied supplemental financial information regarding the potential private sale offer	1.10	1,540.00
01/17/21 MLC	Conference call(s) Conference call with AHC professionals to review status of negotiations and next steps	1.00	1,400.00
01/18/21 JSF	Examine Documents Review of Revised Third Party Sale Proposal and Analysis	.40	358.00

OTTERBOURG P.C.  
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Client/Matter: 20186/0002  
Page 28

July 14, 2021  
BILL NO. 217695

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
01/18/21 MLC	Analysis of Memorandum Reviewed and analyzed revised third party sale proposal and analysis in preparation for follow up calls	1.10	1,540.00
01/19/21 JSF	Examine Documents Review of Additional Information in Support of Third Party Sale Proposal	.30	268.50
01/19/21 MLC	Examine Documents Reviewed and studied certain additional information in further support of third party sale proposal	.50	700.00
01/19/21 MLC	Analysis of Memorandum Review of Media Intervenors' Reply in Support of Unsealing Sackler documents	.50	700.00
01/20/21 JSF	Examine Documents Review of Status of Open Mediation Items for Plan	.40	358.00
01/20/21 MLC	Analysis of Memorandum Reviewed status of open mediation items in connection with plan	.70	980.00
01/21/21 JSF	Examine Documents Review of Update of Status of Plan Negotiations	.40	358.00

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230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 29

July 14, 2021  
BILL NO. 217695

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
01/21/21 JSF	Examine Documents Review of Plan Term Sheets	.90	805.50
01/21/21 MLC	Conference call(s) Conference call with AHC professionals re strategy sessions for plan negotiations	1.40	1,960.00
01/21/21 MLC	Examine Documents Reviewed and analyzed plan term sheets	1.10	1,540.00
01/21/21 MLC	Examine Documents Reviewed the summary update of the status of plan negotiations	.70	980.00
01/22/21 JSF	Telephone Call(s) Participate in Videoconference of Mediation Subcommittee of AHC re: Review of Sale Financials and Prepare for Meeting with UCC and NCSG	1.10	984.50
01/22/21 JSF	Examine Documents Review of Draft Analysis of Sale Financials and Comparison of Scenarios	.30	268.50
01/22/21 MLC	Conference call(s) Conference call meeting among AHC professionals to prepare for meeting to discuss and review financials of third party sale proposal	1.00	1,400.00



OTTERBOURG P.C.  
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NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 30

July 14, 2021  
BILL NO. 217695

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
01/22/21 MLC	Analysis of Memorandum Reviewed the draft analysis of sale financials and comparison scenarios prepared by HL/FTI	1.30	1,820.00
01/25/21 JSF	Examine Documents Review of Financial Advisors' Presentation - Comparison of Strategic Options	1.40	1,253.00
01/25/21 JSF	Examine Documents Review of Correspondence with Mediators re: Next Steps	.30	268.50
01/25/21 JSF	Examine Documents Review of Debtors' Revisions to Plan Term Sheet	1.60	1,432.00
01/25/21 JSF	Telephone Call(s) Participate in VideoConference with AHC, NCSG, MSGE and UCC re: Financial Advisors' Presentation - Comparison of Strategic Options	1.20	1,074.00
01/25/21 MLC	Conference call(s) Conference call mediation session with AHC, NCSG and UCC concerning private sale proposal	1.30	1,820.00

OTTERBOURG P.C.  
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NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 31

July 14, 2021  
BILL NO. 217695

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
01/25/21 MLC	Review Financial Documents Reviewed and analyzed the presentation by the Financial Advisors comparing the strategic options available to the AHC and States	2.10	2,940.00
01/25/21 MLC	Correspondence Review of correspondence by mediators re next steps	.30	420.00
01/25/21 MLC	Analysis of Memorandum Reviewed and studied debtors' revisions to the plan term sheet	2.10	2,940.00
01/26/21 JSF	Telephone Call(s) Participate in Conference Call with Mediation Subcommittee re: Status of Negotiations and Plan Options	.60	537.00
01/26/21 JSF	Examine Documents Review of Draft Correspondence to Sacklers re: Settlement Proposal	.30	268.50
01/26/21 MLC	Conference call(s) Conference call with AHC States subcommittee to discuss negotiations concerning private sale proposal and next steps	.50	700.00

OTTERBOURG P.C.  
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NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 32

July 14, 2021  
BILL NO. 217695

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
01/26/21 MLC	Conference call(s) Conference call with AHC mediation subcommittee to discuss status of negotiations and next steps	.50	700.00
01/26/21 MLC	Correspondence Review of draft correspondence to Sacklers' counsel re settlement proposal	.30	420.00
01/27/21 JSF	Telephone Call(s) Participate in Videoconference with AHC and Sacklers re: Plan Settlement	1.00	895.00
01/27/21 JSF	Telephone Call(s) Participate in Videoconference with Mediation Subcommittee re: Sackler Negotiations	.50	447.50
01/27/21 JSF	Examine Documents Review of Plan Term Sheet Issues (Non-Governance Related) and Changes to Term Sheet	1.40	1,253.00
01/27/21 MLC	Conference call(s) Mediation zoom meeting with Sacklers/AHC and mediators	.80	1,120.00
01/27/21 MLC	Conference call(s) Follow up conference call with AHC counsel reflecting on mediation call with Sackler representatives	1.10	1,540.00

OTTERBOURG P.C.  
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NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 33

July 14, 2021  
BILL NO. 217695

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
01/27/21 MLC	Correspondence Correspondence with AHC mediation members re non-governance term sheet issues	1.30	1,820.00
01/27/21 MLC	Analysis of Memorandum Review and analysis of revisions to plan term sheet issues concerning non-governance issues	1.30	1,820.00
01/28/21 JSF	Examine Documents Review and Analysis of Possible Parameters of Acceptable Releases by States for Inclusion in Plan	2.80	2,506.00
01/28/21 JSF	Examine Documents Review of Correspondence re: Third Party Sale Proposal and Analysis of Status of Strategic Plan Options	.90	805.50
01/28/21 MLC	Conference call(s) Conference call with AHC counsel and mediation parties re next steps in mediation and plan process	1.30	1,820.00
01/28/21 MLC	Conference call(s) Zoom meeting with AHC members re non-governance plan issues	1.40	1,960.00
01/28/21 MLC	Prepare for Meeting Review of proposed changes to term sheet	1.30	1,820.00

OTTERBOURG P.C.  
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NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 34

July 14, 2021  
BILL NO. 217695

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
01/28/21 MLC	Review Financial Documents Review HL analysis/memo of private sale proposal	.80	1,120.00
01/28/21 MLC	Correspondence Debtors' joint letter to mediators re: settlement proposal	.60	840.00
01/28/21 MLC	Correspondence Correspondence from Troop re NAS Phase 2 term sheet and proposed modifications	.80	1,120.00
01/28/21 MLC	Analysis of Memorandum Analysis of memorandum re breadth of releases which States may proffer in context of injunction provision of POR	1.40	1,960.00
01/28/21 MLC	Correspondence Review of Debtors' response to private purchase proposal	.60	840.00
01/28/21 MLC	Correspondence Review and analysis of private purchase proposal	1.20	1,680.00
01/28/21 MLC	Correspondence Correspondence among AHC counsel re NCSG response to sale proposal	.40	560.00

OTTERBOURG P.C.  
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NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 35

July 14, 2021  
BILL NO. 217695

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
01/29/21 JSF	Examine Documents Analysis of Terms of Third Party Purchase Proposal, Potential Counter Terms and Related Issues	.80	716.00
01/29/21 MLC	Analysis of Memorandum Review and analysis of Sackler settlement proposal	1.30	1,820.00
01/29/21 MLC	Conference call(s) Call with AHC counsel and AHC mediation members re Sackler proposal	1.10	1,540.00
01/29/21 MLC	Telephone Call(s) Telcon with Ken Eckstein re strategy towards POR	.50	700.00
01/30/21 MLC	Correspondence Correspondence among AHC counsel and certain States re Sackler proposal and next steps	.40	560.00
01/31/21 JSF	Examine Documents Review of Strategic Options Analysis by Financial Advisors in Advance of Presentation	1.30	1,163.50
01/31/21 MLC	Analysis of Memorandum Review and analysis of sale proposal prepared by HL/FTI	.80	1,120.00

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NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 36

July 14, 2021  
BILL NO. 217695

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
01/31/21 MLC	Correspondence Correspondence among AHC counsel re Sackler proposal	1.10	1,540.00
02/01/21 JSF	Telephone Call(s) Participate in Videoconference with State AGs, UCC, HAC, NCSG re: Alternative Sale Proposal	1.80	1,611.00
02/01/21 JSF	Examine Documents Review of Updated Financial Advisor Presentation re: Strategic Options and Comparison and Revised Offer	.70	626.50
02/01/21 JSF	Examine Documents Review of Correspondence and Update on Negotiations with Sacklers	.40	358.00
02/01/21 MLC	Conference call(s) Conference call with AHC mediation team re weekend discussions with Sacklers, UCC and NCSG	1.00	1,400.00
02/01/21 MLC	Telephone Call(s) Follow up telcon with Ken Eckstein re strategy mediation issues	.20	280.00
02/01/21 MLC	Conference call(s) Meeting with AHC and DOJ re term sheet review and mark-ups	1.50	2,100.00

OTTERBOURG P.C.  
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NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 37

July 14, 2021  
BILL NO. 217695

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
02/01/21 MLC	Conference call(s) Financial presentation re sale proposal and other options with AHC and NCSG and their representatives	2.00	2,800.00
02/01/21 MLC	Examine Documents Examined documents describing update on negotiations with Sacklers	.80	1,120.00
02/01/21 MLC	Review Financial Documents Reviewed financial analysis prepared by FTI/HL concerning third party proposal to buy company	1.20	1,680.00
02/02/21 JSF	Examine Documents Review of Proposed AHC Revisions to Plan Term Sheet and Open Issues List	.70	626.50
02/02/21 JSF	Examine Documents Review of Financial Advisors' Analysis of Sackler Proposal and Different Iterations of Proposal and Open Issues	.70	626.50
02/02/21 MLC	Conference call(s) Conference call with AHC mediation members re review of Sackler proposal	.60	840.00
02/02/21 MLC	Conference call(s) Meeting with DOJ, consenting states' representatives and counsel re update on Sackler and other negotiations	1.00	1,400.00



OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 38

July 14, 2021  
BILL NO. 217695

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
02/02/21 MLC	Examine Documents Reviewed proposed AHC revisions to plan term sheet and open issues	.90	1,260.00
02/02/21 MLC	Review Financial Documents Reviewed and studied the analysis of the Sackler proposal and various iterations of the proposal as prepared by HL/FTI	1.10	1,540.00
02/03/21 JSF	Examine Documents Review of Revised Plan Term Sheet and Open Issues	1.30	1,163.50
02/03/21 JSF	Examine Documents Review of Financial Advisors' Summary of Possible Minimum Distrubution Parameters re: Trust	.30	268.50
02/03/21 JSF	Examine Documents Review of Updates and Open Issues on Plan Negotiations and Sackler Contribution	.90	805.50
02/03/21 MLC	Review Financial Documents Reviewed the summary of possible minimum distribution parameters re trust which was prepared by HL/FTI	.80	1,120.00
02/03/21 MLC	Examine Documents Reviewed memo concerning updates and open issues on plan negotiations and Sackler contribution	1.30	1,820.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 39

July 14, 2021  
BILL NO. 217695

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
02/03/21 MLC	Telephone Call(s) Follow up telcon with Ken Eckstein re status of various negotiations and next steps	.40	560.00
02/04/21 MLC	Conference call(s) Conference call with working subgroup re plan term sheet	1.00	1,400.00
02/04/21 MLC	Conference call(s) Conference call with States subgroup re plan issues including agreements with privates	.60	840.00
02/04/21 MLC	Examine Documents Reviewed the Minimum Distribution Memo for Trust, including summary and options	.60	840.00
02/04/21 MLC	Analysis of Memorandum Reviewed summary of interviews and recommendation for replacement monitor	.80	1,120.00
02/05/21 JSF	Examine Documents Review of Draft Agreement re: Sackler Contribution and Related Issues	.70	626.50
02/05/21 MLC	Analysis of Memorandum Reviewed draft agreement regarding the proposed Sackler contribution and related issues	1.00	1,400.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 40

July 14, 2021  
BILL NO. 217695

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
02/08/21 JSF	Examine Documents Review of Restructured Third Party Tranasaction Proposal for Possible Sale of Business	1.20	1,074.00
02/08/21 JSF	Examine Documents Review of Update on Sackler Final Negotiations on Payment Terms	.40	358.00
02/08/21 MLC	Analysis of Memorandum Reviewed the Restructured Third Party Transaction Proposal for sale of the debtors' business	2.20	3,080.00
02/08/21 MLC	Analysis of Memorandum Reviewed and analyzed correspondence from Gilbert providing update on Sackler Final Negotiations on Payment Terms	.70	980.00
02/09/21 JSF	Examine Documents Review of Update on Sackler Negotiations and Financial Analysis of Counter-Proposals	.30	268.50
02/09/21 MLC	Examine Documents Reviewed update provided with respect to Sackler Negotiations together with a Financial Analysis of Counter-Proposals	1.20	1,680.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 41

July 14, 2021  
BILL NO. 217695

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
02/10/21 JSF	Examine Documents Review of Analysis of Minimum Distribution and Operating Parameters AHC and Debtors' Current Position	.40	358.00
02/10/21 JSF	Examine Documents Review of Financial Advisors' Presentation on private party sale and Standalone Plan Alternatives	.90	805.50
02/10/21 MLC	Analysis of Memorandum Analyzed the minimum distribution and operating parameters from point of view of the AHC and the Debtors	.60	840.00
02/10/21 MLC	Review Financial Documents Reviewed the financial analysis prepared by the financial advisors on the third party purchaser vs standalone plan alternatives	1.10	1,540.00
02/11/21 JSF	Examine Documents Review of Financial Advisors' Summary Analysis and Comparison of Standalone Plan and Sale Option	.50	447.50
02/11/21 JSF	Examine Documents Review and Analysis of Open Plan Issues and Go Forward Options	.70	626.50

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 42

July 14, 2021  
BILL NO. 217695

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
02/11/21 MLC	Conference call(s) Conference call with certain states and AHC counsel re plan discussions	.70	980.00
02/11/21 MLC	Analysis of Memorandum Continued review and analysis of the summary analysis and comparison of the standalone plan and sale option prepared by HL/FTI	1.00	1,400.00
02/11/21 MLC	Correspondence Reviewed correspondence analyzing the open plan issues and next steps	.80	1,120.00
02/12/21 JSF	Examine Documents Review of Futher Updated Financial Presentations to AHC re: Standalone and Sale Proposals and Economic Analysis	1.40	1,253.00
02/12/21 JSF	Examine Documents Review of Revised Governance Term Sheet from Debtors	.70	626.50
02/12/21 MLC	Examine Documents Continued review and analysis of the presentation prepared by HL/FTI regarding the standlone and sale alternative proposals and their respective economic analysis	1.80	2,520.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 43

July 14, 2021  
BILL NO. 217695

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
02/12/21 MLC	Analysis of Memorandum Reviewed and analyzed the revised governance term sheet prepared by debtors	1.30	1,820.00
02/16/21 JSF	Examine Documents Review of Update on Negotiations with Sackler Family and New Proposals	.30	268.50
02/16/21 JSF	Telephone Call(s) Participate in Videoconference with AHC interested buyer re: Alternative Plan Option	1.70	1,521.50
02/16/21 JSF	Telephone Call(s) Participate in Meeting with AHC, NCSG, MSGE and UCC re: Plan and Exit Options	2.00	1,790.00
02/16/21 JSF	Examine Documents Review of Revised Plan and Governance Term Sheet and Open Issues/Status	1.20	1,074.00
02/16/21 MLC	Conference call(s) Conference call with States subgroup and KL re pending Plan issues	.70	980.00
02/16/21 MLC	Conference call(s) Conference call with AHC, professionals re discussion of proposed purchase by third party	1.10	1,540.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 44

July 14, 2021  
BILL NO. 217695

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
02/16/21 MLC	Conference call(s) Conference call meeting with NCSG/AHC re purchase interest by private party	1.30	1,820.00
02/16/21 MLC	Examine Documents Reviewed update provided re negotiations with the Sackler family and the new proposals	.90	1,260.00
02/16/21 MLC	Prepare for Meeting Prepared for meeting with HL/FTI and third party proposed purchaser by reviewing financial analysis prepared by financial advisors	1.10	1,540.00
02/16/21 MLC	Examine Documents Reviewed and analyzed the revised plan and governance term sheet together with a summary of open issues	1.40	1,960.00
02/17/21 JSF	Telephone Call(s) Participate in Plan Subcommittee Meeting with AHC Professionals and Members of Subcommittee re: Plan Issues	1.80	1,611.00
02/17/21 JSF	Examine Documents Review of Updates on Settlement Negotiations with Sacklers and Remaining Plan and Contribution Issues	1.10	984.50

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 45

July 14, 2021  
BILL NO. 217695

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
02/17/21 MLC	Conference call(s) Conference call with AHC professionals re review of open plan issues	1.00	1,400.00
02/17/21 MLC	Analysis of Memorandum Reviewed and analyzed the updates provided by Gilbert re the settlement negotiations with the Sacklers and the remaining plan and contribution issues	1.80	2,520.00
02/18/21 MLC	Correspondence Reviewed correspondence from AHC counsel concerning discussions with PI claimants	.80	1,120.00
02/18/21 MLC	Telephone Call(s) Telcon with Andrew Troop re status of various discussions with NCSG	.70	980.00
02/19/21 JSF	Examine Documents Review Update on Status of Negotiations with Sacklers re: Payment Schedule	.30	268.50
02/19/21 JSF	Examine Documents Review of Mark-Up of Governance Term Sheet	1.80	1,611.00
02/19/21 MLC	Correspondence Reviewed correspondence memo providing update on the status of negotiations with the Sackler family re the schedule of payments	.40	560.00



OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 46

July 14, 2021  
BILL NO. 217695

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
02/19/21 MLC	Analysis of Memorandum Reviewed and analyzed the mark-up of the governance term sheet	1.50	2,100.00
02/21/21 JSF	Examine Documents Review and Attention to Open Plan Issues and Status	.70	626.50
02/22/21 MLC	Examine Documents Reviewed mark-up to plan term sheet prepared by debtors	2.20	3,080.00
02/22/21 RCY	Examine Documents Review draft plan and preliminary comments to same.	.60	405.00
02/23/21 MLC	Review Financial Documents Reviewed financial analysis prepared by HL/FTI re various plan alternatives re potential sale of businesses	1.70	2,380.00
02/24/21 MLC	Conference call(s) Conference with AHC professionals re third party claims	1.50	2,100.00
02/24/21 MLC	Correspondence Reviewed correspondence among AHC counsel re plan negotiations and next steps	.80	1,120.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 47

July 14, 2021  
BILL NO. 217695

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
02/24/21 MLC	Examine Documents Reviewed and analyzed update re plan term sheet and remaining open issues in negotiation	1.30	1,820.00
02/24/21 RCY	Examine Documents Examine memos re: latest on plan and term sheet.	.60	405.00
02/24/21 RCY	Telephone Call(s) Participate on team call re: case update and strategy.	1.70	1,147.50
02/25/21 MLC	Analysis of Memorandum Reviewed and studied the term sheet describing various counter-proposals	1.10	1,540.00
02/25/21 RCY	Telephone Call(s) Professionals' call re: latest developments and recommendations.	1.50	1,012.50
02/25/21 RCY	Examine Documents Examine term sheet counter.	.60	405.00
02/26/21 MLC	Conference call(s) Conference call among Purdue professionals concerning discussion with consenting states	1.10	1,540.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 48

July 14, 2021  
BILL NO. 217695

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
02/26/21 MLC	Examine Documents Reviewed the memo describing alternative plan option	.90	1,260.00
02/26/21 RCY	Examine Documents Examine Plan Options Memo.	.40	270.00
02/28/21 MLC	Correspondence Correspondence with UCC re certain plan issues including selection process of directors	.60	840.00
03/01/21 MLC	Court Appearance - General Attended hearing on motion to extend exclusivity and injunction	.80	1,120.00
03/01/21 MLC	Analysis of Memorandum Reviewed and analyzed memorandum re post-emergence issues	1.10	1,540.00
03/01/21 MLC	Correspondence Correspondence with DOJ and UCC re scheduling of meetings to coordinate plan provision review	.30	420.00
03/01/21 MLC	Correspondence Correspondence with certain AHC members re selection process of board members	.40	560.00
03/01/21 RCY	Attendance at Hearing Attend hearing on plan exclusivity.	.60	405.00

OTTERBOURG P.C.  
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NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 49

July 14, 2021  
BILL NO. 217695

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
03/02/21 MLC	Conference call(s) Meeting with States subgroup with KL re open plan issues	1.50	2,100.00
03/02/21 MLC	Analysis of Memorandum Review of consultant indemnification agreement	1.20	1,680.00
03/02/21 MLC	Analysis of Memorandum Review and analysis of revised drafts of the Plan and the NewCo/TopCo Term Sheet received from the Debtors	2.10	2,940.00
03/03/21 MLC	Conference call(s) conference call meeting to interview two search firms re: board positions	2.00	2,800.00
03/04/21 MLC	Conference call(s) Conference call with States subgroup and KL concerning current plan provisions and next steps	1.00	1,400.00
03/04/21 MLC	Correspondence Correspondence with States subgroup concerning telcon with Debtors' counsel re plan developments	.60	840.00
03/04/21 MLC	Analysis of Memorandum Review and analysis of revised term sheet provisions as modified by AHC/States	3.10	4,340.00

OTTERBOURG P.C.  
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Client/Matter: 20186/0002  
Page 50

July 14, 2021  
BILL NO. 217695

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
03/05/21 MLC	Conference call(s) Conference call with AHC and Debtors and their counsel re open plan issues	1.40	1,960.00
03/05/21 MLC	Analysis of Memorandum Review and analysis of mark up of plan term sheet	1.60	2,240.00
03/05/21 MLC	Correspondence Correspondence between Peacock and Brown Rudnick re operations of various trusts	.70	980.00
03/05/21 MLC	Correspondence Correspondence with AHC subgroup re selection of firm to assist in recruiting and selecting board members	.40	560.00
03/06/21 MLC	Correspondence Correspondence with States and Gilbert firm re preparation of statement re governance structure for NCSG	.90	1,260.00
03/06/21 MLC	Analysis of Memorandum Review and analysis of updated term sheet	2.20	3,080.00
03/06/21 MLC	Correspondence correspondence among AHC counsel re latest turn of term sheet	.70	980.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 51

July 14, 2021  
BILL NO. 217695

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
03/07/21 MLC	Analysis of Memorandum Review of mark up of term sheet and related documents	1.30	1,820.00
03/08/21 MLC	Analysis of Memorandum Reviewed term sheet revised by debtors' counsel	1.40	1,960.00
03/10/21 MLC	Analysis of Memorandum Reviewed and analyzed plan amendments	2.30	3,220.00
03/10/21 MLC	Analysis of Memorandum Reviewed amendments to plan supplements	1.70	2,380.00
03/10/21 MLC	Correspondence Correspondence with DPW re exchange of certain drafts with other parties	.40	560.00
03/10/21 MLC	Correspondence Correspondence among AHC subgroup to revise certain definition terms in amended TS	.60	840.00
03/10/21 RCY	Examine Documents Examine comments to latest plan draft.	.90	607.50
03/11/21 MLC	Conference call(s) Conference call with Debtors and AHC re remaining open issues re plan negotiations	1.00	1,400.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 52

July 14, 2021  
BILL NO. 217695

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
03/11/21 MLC	Analysis of Memorandum Continued review of plan amendments	3.30	4,620.00
03/11/21 MLC	Telephone Call(s) Telcon with Ken Eckstein re status of certain outstanding issues	.70	980.00
03/11/21 RCY	Examine Documents Examine latest comments to draft plan.	.20	135.00
03/12/21 MLC	Analysis of Memorandum Reviewed and analyzed revisions to plan	2.70	3,780.00
03/13/21 MLC	Conference call(s) Conference call with AHC counsel re plan, remaining open issues and next steps	1.00	1,400.00
03/13/21 MLC	Correspondence Correspondence among AHC subgroup re call to discuss remaining open issues	.30	420.00
03/13/21 MLC	Correspondence Correspondence among AHC subgroup re indemnification open issues	.60	840.00
03/13/21 MLC	Analysis of Memorandum Review of debtors' revisions to Newco/Topco governance term sheet	1.10	1,540.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 53

July 14, 2021  
BILL NO. 217695

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
03/14/21 MLC	Analysis of Memorandum Review of mark-up annotations by Kramer Levin re UCC list of remaining open plan issues	1.10	1,540.00
03/14/21 MLC	Correspondence Correspondence among AHC plan subgroup re fee issues and other open MSGE issues	.60	840.00
03/15/21 JSF	Telephone Call(s) Participate in Conference Call with Professionals and Subgroup re: Status of Plan Negotiations	1.20	1,074.00
03/15/21 JSF	Examine Documents Review of Updated Issues Lists and Status of Open Items for Plan Filing	2.50	2,237.50
03/15/21 MLC	Analysis of Memorandum Review and analysis of memo comparing debtors/AHC drafts of governance term sheets for Topco/NewCo	1.30	1,820.00
03/15/21 MLC	Correspondence Correspondence from J Peacock and J Rice re calls with Kesselman and Birnbaum re status of negotiations re indemnification, criminal releases and other open issues	.80	1,120.00



OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 54

July 14, 2021  
BILL NO. 217695

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
03/15/21 MLC	Correspondence Follow up correspondence from Peacock re calls with Kesselman and Birnbaum re support for plan	.50	700.00
03/15/21 MLC	Correspondence Correspondence among AHC counsel re need for latest Plan drafts and blackline of revisions	.60	840.00
03/15/21 MLC	Examine Documents Reviewed draft of statement to press re position re: plan	.30	420.00
03/15/21 MLC	Analysis of Memorandum Review of revised term sheet as revised by debtors	1.10	1,540.00
03/15/21 MLC	Correspondence Follow up correspondence with Kesselman re status of various decisions and debtors' press release	.40	560.00
03/15/21 MLC	Analysis of Memorandum Memo by Brown Rudnick re tax implications of minimum Topco distributions	.60	840.00
03/15/21 MLC	Analysis of Memorandum Review of MSGE joinder to term sheet	.30	420.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 55

July 14, 2021  
BILL NO. 217695

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
03/15/21 MLC	Analysis of Memorandum Review of follow up comparison of latest revisions to term sheet against prior draft	.80	1,120.00
03/15/21 MLC	Correspondence Follow up correspondence re import of changes to draft term sheet	.40	560.00
03/15/21 MLC	Draft/revise Revisions to draft of debtors' term sheet following conference call meeting with AHC plan subcommittee	.80	1,120.00
03/15/21 MLC	Correspondence Follow up correspondence among AHC subcommittee and counsel re commentary on proposed revisions to plan term sheet	.50	700.00
03/15/21 MLC	Correspondence Correspondence among AHC counsel and AHC plan subcommittee re follow up conferences with DPW re plan revisions	.40	560.00
03/15/21 RCY	Examine Documents Examine draft of proposed plan and related documents in advance of filing.	1.20	810.00
03/16/21 JSF	Examine Documents Review of Filed Plan Materials and Unresolved Issues	1.40	1,253.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 56

July 14, 2021  
BILL NO. 217695

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
03/16/21 MLC	Examine Documents Reviewed current draft of plan filed by debtors	1.70	2,380.00
03/16/21 MLC	Examine Documents Reviewed disclosure statement filed by debtors	1.30	1,820.00
03/16/21 MLC	Correspondence Correspondence among AHC counsel and AHC plan subcommittee re changes to debtors' plan and disclosure statement	.70	980.00
03/16/21 RCY	Examine Documents Marked comparisons of filed plan with prior iteration circulated.	.60	405.00
03/16/21 JKH	Review/analyze Review plan and related documents and calendar upcoming deadlines and hearings	.20	65.00
03/17/21 MLC	Correspondence Correspondence among AHC counsel and AHC plan subcommittee re resolution of certain open issues	.60	840.00
03/22/21 JSF	Telephone Call(s) Call with Eric Snyder (Counsel for AL) re: Plan Questions	.40	358.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 57

July 14, 2021  
BILL NO. 217695

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
03/22/21 JSF	Examine Documents Review of Plan and DS	1.50	1,342.50
03/22/21 JSF	Examine Documents Review of Pension Liability Issues re: Inquiry from Alabama Counsel	.30	268.50
03/22/21 RCY	Telephone Call(s) Call with JSF and E. Snyder (Alabama) re: plan contents.	.30	202.50
03/22/21 RCY	Examine Documents Examine disclosure statement re: pension plan treatment and memo to JSF for discussion with Alabama counsel.	1.10	742.50
03/23/21 JSF	Telephone Call(s) Call with Eric Snyder (Counsel to AL) re: Plan Questions	.20	179.00
03/23/21 JSF	Examine Documents Review of Proposed Release Provisions in the Plan	1.30	1,163.50
03/23/21 JSF	Examine Documents Review of Comprehensive Open Issues List and Plan and DS Schedule	2.20	1,969.00
03/23/21 JSF	Examine Documents Review of Mediators' Final Report	.30	268.50

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 58

July 14, 2021  
BILL NO. 217695

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
03/23/21 JSF	Examine Documents Review of Private Settlement Payout Schedule and Payments from Sacklers	.20	179.00
03/23/21 RCY	Examine Documents Examine updated issues list with respect to plan.	.30	202.50
03/23/21 RCY	Examine Documents Examine revised Sackler settlement agreement.	.30	202.50
03/29/21 JSF	Examine Documents Review of Plan Terms	1.80	1,611.00
03/29/21 JSF	Examine Documents Review of Plan and Related Documents Open Issues	1.20	1,074.00
03/29/21 MLC	Analysis of Memorandum Reviewed draft of plan terms	2.20	3,080.00
03/29/21 MLC	Examine Documents Reviewed memorandum comparing revisions to plan terms	1.20	1,680.00
03/30/21 JSF	Examine Documents Review of Update on Status of Negotiations with MSGE	.20	179.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 59

July 14, 2021  
BILL NO. 217695

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
03/30/21 JSF	Examine Documents Review of Filed Plan and Disclosure Statement	1.70	1,521.50
03/30/21 JSF	Examine Documents Review of Releases and Open Issues	.80	716.00
03/30/21 MLC	Correspondence Reviewed correspondence providing update re negotiations re MSGE	.30	420.00
03/30/21 MLC	Examine Documents Reviewed filed plan and DS	2.30	3,220.00
03/30/21 MLC	Analysis of Memorandum Reviewed memo re releases and other remaining open issues	1.10	1,540.00
03/30/21 MLC	Correspondence Review of correspondence among AHC counsel re: plan status and ongoing negotiations	2.30	3,220.00
03/31/21 JSF	Examine Documents Review of Sackler Credit Support Proposals and Open Issues re: Sackler Contribution	.60	537.00
03/31/21 JSF	Examine Documents Review of Status of Open Issues on Plan and Remaining Negotiations	.80	716.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 60

July 14, 2021  
BILL NO. 217695

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
03/31/21 MLC	Examine Documents Reviewed Sackler credit support proposals and open issues with respect to Sackler contribution	.90	1,260.00
03/31/21 MLC	Correspondence Correspondence outlining remaining open issues and remaining negotiations	.70	980.00
04/01/21 JSF	Examine Documents Review of Motion of Debtors to Enter Into MSGE Term Sheet	.40	358.00
04/01/21 MLC	Examine Documents Review and analysis of debtors' motion to enter into MSGE term sheet including payment of attorney fees	.90	1,260.00
04/01/21 MLC	Correspondence Correspondence with AHC counsel and state subgroup re need to modify IR terms for NewCo agreement	.60	840.00
04/01/21 MLC	Correspondence Correspondence with NCSG re concerns with various provisions in draft plan and term sheet	.80	1,120.00
04/01/21 MLC	Examine Documents Analyzed blackline of proposed changes and comments by NCSG to draft governance term sheet	1.10	1,540.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 61

July 14, 2021  
BILL NO. 217695

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/02/21 JSF	Examine Documents Updated Abatement Term Sheet re: Allocation and Use of Abatement Funds	1.10	984.50
04/02/21 JSF	Examine Documents Review of Draft NOAT Trust Document in Connection with Plan	1.30	1,163.50
04/02/21 JSF	Examine Documents Review of Draft Plan of Reorganization and Possible Revisions	1.80	1,611.00
04/02/21 MLC	Analysis of Memorandum Review of revised abatement term sheet re allocation and use of abatement funds	2.20	3,080.00
04/02/21 MLC	Analysis of Memorandum Reviewed draft plan of reorganization and proposed revisions	2.20	3,080.00
04/02/21 MLC	Correspondence Correspondence with counsel for NCSG and MSGGE re sharing of working drafts of various agreements	.70	980.00
04/04/21 MLC	Examine Documents Review of FTI/HL draft of value analysis of cash flow to NOAT	1.10	1,540.00



OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 62

July 14, 2021  
BILL NO. 217695

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/05/21 JSF	Examine Documents Review of Illustrative Net Distributable Value Analysis Prepared by Financial Advisors	.40	358.00
04/05/21 JSF	Examine Documents Review of NCSG Mark-Up of Governance TS and Disclosure Statement	1.60	1,432.00
04/05/21 MLC	Correspondence Correspondence among AHC counsel analyzing FTI/HL valuation analysis	.90	1,260.00
04/05/21 MLC	Analysis of Memorandum Continued review of markup by NCSG of governance term sheet and disclosure statement	2.10	2,940.00
04/06/21 JSF	Examine Documents Review of Update on Proposed Distribution Timetable and Related Issues	.60	537.00
04/06/21 MLC	Examine Documents Review of revised draft of distribution timetable	.70	980.00
04/06/21 MLC	Correspondence Correspondence with FTI/HL and AHC counsel re continued analysis of valuation of cash flow to NOAT	1.10	1,540.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 63

July 14, 2021  
BILL NO. 217695

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/07/21 JSF	Examine Documents Review of Draft of Amended Plan of Reorganization from Debtors	.80	716.00
04/07/21 JSF	Examine Documents Review of Draft of Amended Governance Term Sheet from Debtors	.30	268.50
04/07/21 MLC	Examine Documents Reviewed draft of amended governance term sheet provided by debtors	.60	840.00
04/07/21 MLC	Examine Documents Review of revised plan provided by debtors	1.40	1,960.00
04/07/21 MLC	Correspondence Correspondence with debtors' counsel re certain tax revisions and consequences	.30	420.00
04/07/21 MLC	Examine Documents Review of NCSG proposed revisions to solicitation documents	.90	1,260.00
04/08/21 JSF	Telephone Call(s) Participate in Call with Plan Negotiation Group re: Revised Plan and Open Issues	1.10	984.50
04/08/21 JSF	Examine Documents Review of Revised Net Distributable Value Analysis	.30	268.50

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 64

July 14, 2021  
BILL NO. 217695

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/08/21 JSF	Examine Documents Review of Revised Proposed Amended Plan and Update to Open Issues List	1.80	1,611.00
04/08/21 MLC	Conference call(s) Conference call with AHC counsel re proposed revisions to plan	1.00	1,400.00
04/08/21 MLC	Conference call(s) Conference call with certain state representatives and AHC counsel re strategy for speaking with certain States	.70	980.00
04/08/21 MLC	Review Plan of Reorganization Reviewed and analyzed proposed changes to plan of reorganization prepared by DPW	3.80	5,320.00
04/08/21 MLC	Analysis of Correspondence Reviewed and analyzed correspondence with NCSG re demands	.60	840.00
04/09/21 JSF	Examine Documents Review of Revised Debtor Draft of Proposed Settlement Agreement for Payment Terms with Sacklers	.40	358.00
04/09/21 MLC	Conference call(s) Conference call with AHC team re NOAT/TAFT agreements and revised abatement TS	1.00	1,400.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 65

July 14, 2021  
BILL NO. 217695

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/09/21 MLC	Examine Documents Reviewed revisions to settlement agreement with Sacklers	2.10	2,940.00
04/10/21 MLC	Correspondence Correspondence with AHC re call with Jersey counsel	.20	280.00
04/11/21 JSF	Examine Documents Review of Revised Abatement Term Sheet	.50	447.50
04/11/21 MLC	Examine Documents Review of comments to plan by UCC	1.20	1,680.00
04/11/21 MLC	Correspondence Review of agenda and questions for Jersey counsel	.30	420.00
04/12/21 JSF	Telephone Call(s) Telephone Call with AHC, UCC and Jersey Counsel re: Issues Relevant to Jersey Law	.60	537.00
04/12/21 JSF	Examine Documents Review of UCC Mark-Up of Plan and Update on Open Issues List	1.80	1,611.00
04/12/21 MLC	Conference call(s) Conference call with UCC and AHC with Jersey counsel re analysis of judgment enforcement law in Jersey	.70	980.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 66

July 14, 2021  
BILL NO. 217695

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/12/21 MLC	Examine Documents Continued review of comments by UCC to draft plan	1.30	1,820.00
04/13/21 JSF	Telephone Call(s) Participate in Continued Call with UCC Jersey Counsel re: Issues of Jersey Law	.70	626.50
04/13/21 JSF	Examine Documents Review Draft of TPP APP Abatement Trust Term Sheet	.20	179.00
04/13/21 JSF	Telephone Call(s) Call with Plan Subcommittee and Professionals re: Debtors' Revisions to Abatement Term Sheet	1.00	895.00
04/13/21 JSF	Examine Documents Review of Mark-Up of Abatement Term Sheet	.40	358.00
04/13/21 JSF	Examine Documents Review of Debtors' Disclosure Statement	1.40	1,253.00
04/13/21 MLC	Conference call(s) Continued call with Jersey counsel together with UCC and AHC re judgment enforcement under Jersey law	.80	1,120.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 67

July 14, 2021  
BILL NO. 217695

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/13/21 MLC	Conference call(s) Conference call meeting with AHC counsel and certain State representatives re open Plan issues and next steps	.50	700.00
04/13/21 MLC	Analysis of Memorandum Review of proposed changes to TPP Abatement Plan	1.80	2,520.00
04/13/21 MLC	Analysis of Memorandum Review of proposed changes to abatement term sheet by DPW and UCC	1.60	2,240.00
04/13/21 MLC	Conference call(s) Conference call with AHC subcommittee to discuss and review abatement term sheet mark-up by DPW and UCC	1.00	1,400.00
04/14/21 JSF	Telephone Call(s) Call with Plan Subcommittee re: Continuation of Discussion on Abatement Term Sheet	.50	447.50
04/14/21 JSF	Examine Documents Review of Abatement Term Sheet Draft and Issues	.40	358.00
04/14/21 JSF	Examine Documents Review of POR and Open Issues for Plan and Governance	1.80	1,611.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 68

July 14, 2021  
BILL NO. 217695

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/14/21 MLC	Conference call(s) Conference call with counsel for Debtors, Sacklers, AHC, UCC, MSGE and NCSG in which NCSG describes proposed settlement terms to Sacklers	.70	980.00
04/14/21 MLC	Analysis of Correspondence Review and analysis of correspondence from NCSG counsel re agreement with TPP and others re term sheet	.70	980.00
04/14/21 MLC	Analysis of Memorandum Review and analysis of term sheet re released parties and excluded parties	1.70	2,380.00
04/15/21 JSF	Examine Documents Review and Analysis of Open Plan Issues and Status of NCSG Discussions	.60	537.00
04/15/21 MLC	Conference call(s) Conference call with States' working group re review of interstate allocation proposal approved by States' AGs	.90	1,260.00
04/15/21 MLC	Correspondence Correspondence with KL re their call with DPW re scheduling of disclosure statement hearing	.40	560.00
04/15/21 MLC	Analysis of Memorandum Analysis of plan document issues list prepared by KL	.90	1,260.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 69

July 14, 2021  
BILL NO. 217695

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/15/21 MLC	Analysis of Memorandum Analysis of issue list prepared by KL re Sackler releases to be provided in Plan for governmental and non-governmental parties	1.40	1,960.00
04/15/21 MLC	Correspondence Correspondence with NCSG counsel and non-State representatives re State Abatement Agreement Term Sheet	.60	840.00
04/16/21 JSF	Examine Documents Review of Analysis of Sackler Settlement and Related Issues	.60	537.00
04/16/21 MLC	Conference call(s) Conference call with States' subgroup with DPW and Debtor re State Allocation methodology	.80	1,120.00
04/16/21 MLC	Conference call(s) Conference call with counsel and State subgroup to discuss certain fees and allocation issues with NCSG	1.00	1,400.00
04/17/21 JSF	Examine Documents Review of UCC Statement Re: Approval of MSGE Term Sheet	.20	179.00
04/17/21 JSF	Examine Documents Review of Draft Release Provisions and List of Open Issues and Status	.40	358.00



OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 70

July 14, 2021  
BILL NO. 217695

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/17/21 MLC	Examine Documents Review of UCC statement re approval of MSGE term sheet	.30	420.00
04/17/21 MLC	Examine Documents Review of draft of release provisions and list of open issues	.40	560.00
04/17/21 MLC	Correspondence Correspondence re sharing of drafts with various parties	.30	420.00
04/18/21 MLC	Correspondence Correspondence re scheduling with Jersey counsel follow up	.10	140.00
04/19/21 MLC	Correspondence Correspondence with AHC plan subcommittee re support for various arguments from prior transcripts	.80	1,120.00
04/19/21 MLC	Correspondence Correspondence from DPW re timing of filing of plan and disclosure statement and term sheets	.40	560.00
04/19/21 MLC	Examine Documents Review of agenda filed by debtors for upcoming hearing	.30	420.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 71

July 14, 2021  
BILL NO. 217695

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/20/21 MLC	Conference call(s) Conference call with AHC counsel and state subgroup re plan negotiations	.70	980.00
04/20/21 MLC	Conference call(s) Conference call with NCSG, Debtors and AHC re operating injunction and document repository	1.00	1,400.00
04/20/21 MLC	Examine Documents Review of redline by KL of Sackler releases	1.30	1,820.00
04/20/21 MLC	Correspondence Correspondence with NCSG and AHC counsel re upcoming meetings involving injunction and document repository	.30	420.00
04/20/21 MLC	Correspondence Correspondence with Don Simon re tribal allocation matrix	.50	700.00
04/20/21 MLC	Examine Documents Review of issues list prepared and circulated by UCC	.60	840.00
04/20/21 MLC	Examine Documents Review of UCC comments to draft plan	1.60	2,240.00
04/21/21 MLC	Conference call(s) Conference call with debtors to review and discuss NOAT abatement term sheet	1.00	1,400.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 72

July 14, 2021  
BILL NO. 217695

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/22/21 JSF	Examine Documents Review of Memo re: Plan Confirmation and Potential Appellate Issues	.40	358.00
04/22/21 JSF	Examine Documents Review of UST Objection to Disclosure Statement	.60	537.00
04/22/21 JSF	Examine Documents Review Draft of PJT Valuation Analysis and Liquidation Analyses re: Plan and Disclosure Statement	.60	537.00
04/22/21 MLC	Examine Documents Review of memorandum re plan confirmation and potential appellate issue	.50	700.00
04/22/21 MLC	Examine Documents Review of UST objection to DS	.60	840.00
04/22/21 MLC	Examine Documents Review of draft of PJT valuation analysis re plan and DS	.80	1,120.00
04/22/21 MLC	Examine Documents Review of proposed order approving DS	.60	840.00
04/22/21 MLC	Examine Documents Review and analysis of debtors' revisions to abatement term sheet	1.30	1,820.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 73

July 14, 2021  
BILL NO. 217695

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/22/21 MLC	Examine Documents Review of outline of debtors' valuation and liquidation analysis	.40	560.00
04/22/21 MLC	Correspondence Correspondence with FTI/HL reviewing debtors' valuation and liquidation analysis	.40	560.00
04/22/21 MLC	Examine Documents Review of TDPs prepared by debtors re hospitals and TPPs	.70	980.00
04/22/21 MLC	Correspondence Correspondence with NCSG and DPW re mediation with bankruptcy judge	.20	280.00
04/23/21 JSF	Examine Documents Review of Objections to Disclosure Statement	1.60	1,432.00
04/23/21 JSF	Examine Documents Review of Debtors' Mark-Up of Abatement Trust Term Sheet	.40	358.00
04/23/21 MLC	Analysis of Memorandum Review of Public School District objection filed to disclosure statement	1.20	1,680.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 74

July 14, 2021  
BILL NO. 217695

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/23/21 MLC	Examine Documents Review of DPW mark-up of certain TDPs for PIs	.90	1,260.00
04/23/21 MLC	Analysis of Memorandum Review of debtors' revisions to appellate procedures re PI TDP	.40	560.00
04/23/21 MLC	Analysis of Memorandum Review of summary of debtors' comments to abatement TS	.80	1,120.00
04/23/21 MLC	Examine Documents Review of various objections filed in opposition to DS	1.10	1,540.00
04/23/21 MLC	Correspondence Correspondence with mediation subgroup re debtors' revisions to TDPs	.30	420.00
04/24/21 JSF	Examine Documents Review of Filed First Amended Plan of Reorganization	1.20	1,074.00
04/24/21 MLC	Examine Documents Review of FTI/HL comments to debtors' valuation analysis	.70	980.00
04/24/21 MLC	Analysis of Memorandum Review of blackline changes in first amended plan filed by debtors	1.40	1,960.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 75

July 14, 2021  
BILL NO. 217695

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/24/21 MLC	Correspondence Correspondence with states subgroup re certain changes proposed in amended plan	.40	560.00
04/24/21 MLC	Correspondence Correspondence from KL providing comparison of changes in plan and first amended plan of reorganization	.80	1,120.00
04/24/21 MLC	Examine Documents Review of suggested amendments to abatement term sheet	.70	980.00
04/24/21 MLC	Correspondence Correspondence with states subgroup re interstate allocation of NOAT abatement funds	.40	560.00
04/24/21 MLC	Correspondence Correspondence with mediation subgroup re debtors' correspondence with tribes re tribal allocation	.60	840.00
04/24/21 MLC	Correspondence Correspondence with mediation subgroup re MSGGE proposed changes to abatement term sheet	.30	420.00
04/25/21 JSF	Examine Documents Further Review of Objections filed to Disclosure Statement	.40	358.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 76

July 14, 2021  
BILL NO. 217695

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/25/21 JSF	Examine Documents Review of Further Revised and Updated Proposed Abatement Term Sheet	.40	358.00
04/25/21 JSF	Examine Documents Review of Blackline of Newly Filed Disclosure Statement for First Amended Plan	.80	716.00
04/25/21 MLC	Examine Documents Reviewed summary analysis prepared by KL of changes to abatement term sheet and related documents	1.10	1,540.00
04/25/21 MLC	Analysis of Memorandum Review and analysis of chart prepared by KL summarizing objections to DS and Plan	.90	1,260.00
04/25/21 MLC	Analysis of Memorandum Review of proposed revisions to abatement term sheet concerning DOJ	.60	840.00
04/26/21 JSF	Examine Documents Review of Additional Objections to Disclosure Statement - Ad Hoc Committee on Accountability and NAS Ad Hoc	.70	626.50
04/26/21 MLC	Analysis of Memorandum Review of objection filed by Ad Hoc Committee on Accountability and NAS ad hoc committee	.80	1,120.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 77

July 14, 2021  
BILL NO. 217695

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/26/21 MLC	Analysis of Memorandum Review of second plan supplement	.80	1,120.00
04/27/21 MLC	Conference call(s) Call with state subgroup and AHC counsel to review pending open issues	.80	1,120.00
04/27/21 MLC	Conference call(s) Continued follow up call re Jersey Law issues	.60	840.00
04/27/21 MLC	Analysis of Memorandum Review of West Virginia objection to Plan	.90	1,260.00
04/28/21 JSF	Telephone Call(s) Call with AHC Professionals and NCSG Counsel re: Objections to Disclosure Statement	.50	447.50
04/28/21 MLC	Conference call(s) Conference call with AHC counsel and NCSG counsel to review West Virginia concerns and open issues	1.00	1,400.00
04/29/21 JSF	Telephone Call(s) Call with Professionals and State Representatives re: Update on Open Plan Issues	.50	447.50



OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 78

July 14, 2021  
BILL NO. 217695

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/30/21 JSF	Examine Documents Review of Updates to AHC and Recently Filed Documents,	.30	268.50
04/30/21 JSF	Examine Documents Review of Updated Letter to Debtors on Open Issues	.30	268.50
04/30/21 JSF	Examine Documents Review of NCSG Objection to Disclosure Statement	.80	716.00
04/30/21 MLC	Examine Documents Review of amended disclosure statement filed by debtors	1.30	1,820.00
04/30/21 MLC	Correspondence Correspondence by AHC with DPW re proposed plan revisions	.80	1,120.00
04/30/21 MLC	Correspondence Correspondence with States subgroup with NCSG subgroup re document repository and amendments to term sheet re same	.60	840.00
05/01/21 MLC	Analysis of Memorandum Review of amended DS for first amended plan filed by debtors	1.10	1,540.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 79

July 14, 2021  
BILL NO. 217695

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/01/21 MLC	Correspondence Correspondence between NCSG and AHC state subgroups re document repository term sheet	.30	420.00
05/02/21 MLC	Correspondence Correspondence with NAS ad hoc re presentation by NAS of their claim	.20	280.00
05/03/21 MLC	Correspondence follow-up correspondence with Brattle re state by state allocation breakout of medicaid	.40	560.00
05/03/21 MLC	Correspondence Correspondence with state subgroup re outstanding issues re document repository term sheet	.30	420.00
05/04/21 JSF	Examine Documents Review of Outstanding Plan Issues and Positions of UCC and AHC	.60	537.00
05/04/21 MLC	Conference call(s) Conference call with AHC counsel and States subgroup re claims negotiations	.60	840.00
05/05/21 JSF	Examine Documents Review of Draft Response to Objections of School Districts and W. Virginia to Disclosure Statement	.40	358.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 80

July 14, 2021  
BILL NO. 217695

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/06/21 JSF	Examine Documents Plan - Review of Open Issues and Status of DS Hearing	.60	537.00
05/06/21 MLC	Conference call(s) Conference call with States subgroup and AHC counsel re claims negotiatoins	.60	840.00
05/07/21 MLC	Analysis of Memorandum Review of summary analysis prepared by KL concerning mediation order, amendments to DS and Plan, and additional objections to amended plan/DS	.90	1,260.00
05/08/21 MLC	Analysis of Memorandum Review of blackline of second amended DS	2.20	3,080.00
05/09/21 MLC	Analysis of Memorandum Review of memo prepared by KL concerning amendments to various TDPs	.90	1,260.00
05/10/21 JSF	Examine Documents Review of Open Issue - Attorneys' Fees Proposal for Private and Public Creditors	.20	179.00
05/10/21 JSF	Examine Documents Review Draft of AHC Response to Disclosure Statement Objections	.40	358.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 81

July 14, 2021  
BILL NO. 217695

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/10/21 MLC	Analysis of Memorandum Reviewed objections filed by various parties	2.20	3,080.00
05/11/21 JSF	Telephone Call(s) Call with Tribes, NCSG, MSGE and AHC re: Open Plan Issues	.70	626.50
05/11/21 MLC	Conference call(s) Conference call with TLC/NCSG/AHC re discussion about fee requests and allotments by various parties	.80	1,120.00
05/12/21 JSF	Telephone Call(s) Participate in Court Hearing re: Disclosure Statement Procedures	1.10	984.50
05/12/21 MLC	Court Appearance - General Court hearing concerning DS and confirmation procedures	1.50	2,100.00
05/13/21 JSF	Examine Documents Review and Update of Remaining DS Objections	.40	358.00
05/13/21 MLC	Conference call(s) Conference call with certain states' representatives re open issues and next steps	1.00	1,400.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 82

July 14, 2021  
BILL NO. 217695

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/13/21 MLC	Examine Documents Review and update of remaining DS objections	.70	980.00
05/13/21 MLC	Examine Documents Review of scheduling order regarding plan and confirmation hearing	.30	420.00
05/13/21 MLC	Correspondence Correspondence with Gilbert firm re prior negotiations with various third parties	.40	560.00
05/13/21 JKH	Diary & Docket Review scheduling order regarding plan and confirmation and calendar multiple deadlines and hearing dates	.80	260.00
05/14/21 MLC	Conference call(s) Conference call with States working group to review open issues	1.00	1,400.00
05/14/21 MLC	Analysis of Memorandum Memo from KL re public schools' discovery requests	.60	840.00
05/17/21 JSF	Telephone Call(s) Call with Working Group of AHC re: Open Plan Issues and Status	.60	537.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 83

July 14, 2021  
BILL NO. 217695

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/17/21 JSF	Examine Documents Review of Revised AHC Response to DS Objections	.40	358.00
05/17/21 JSF	Examine Documents Review of Plan and Disclosure Statement	1.20	1,074.00
05/17/21 MLC	Conference call(s) Conference call with certain states and AHC counsel re update re DS objections	.50	700.00
05/17/21 MLC	Analysis of Memorandum Reviewed and analyzed memo prepared by KL summarizing proposed revisions to plan	1.10	1,540.00
05/18/21 JSF	Examine Documents Review of Information Sharing Protocol with Debtors re: Discovery Requests of Third Parties	.80	716.00
05/18/21 JSF	Examine Documents Review of AHC Comments to Plan	.40	358.00
05/18/21 MLC	Correspondence Correspondence re proposed settlement of indemnity issues	.50	700.00
05/18/21 MLC	Analysis of Memorandum Review and analysis of draft plan revisions by debtors	1.20	1,680.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 84

July 14, 2021  
BILL NO. 217695

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/20/21 MLC	Court Appearance - General Appeared in court in connection with adjournment of disclosure statement hearing	1.40	1,960.00
05/21/21 JSF	Telephone Call(s) Participate in Call with AHC and NCSG re: Public Schools' Discovery Requests	.90	805.50
05/21/21 JSF	Examine Documents Review of Discovery Requests fro Public Schools	.40	358.00
05/21/21 MLC	Conference call(s) Conference call with AHC counsel and NCSG counsel concerning public schools discovery requests	1.00	1,400.00
05/21/21 MLC	Correspondence Correspondence with KL litigation team regarding the final agreement re Purdue information sharing protocol	.40	560.00
05/21/21 MLC	Analysis of Memorandum Review of KL analysis of public schools' discovery requests	1.10	1,540.00
05/23/21 JSF	Examine Documents Review of Presentation to AHC re: Plan Overview	.60	537.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 85

July 14, 2021  
BILL NO. 217695

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/23/21 MLC	Analysis of Memorandum Review and analysis of KL memo re remaining open plan issues	1.20	1,680.00
05/24/21 JSF	Examine Documents Review of Presentation on Key Plan Issues	.40	358.00
05/24/21 JSF	Examine Documents Review of Third Amended Plan Revisions as Filed	.60	537.00
05/24/21 JSF	Examine Documents Review of Responses to Disclosure Statement - Statements in Support and Objections Disclosure Statement	.80	716.00
05/24/21 MLC	Analysis of Memorandum Review of changes to Disclosure Statement by debtors	3.10	4,340.00
05/25/21 JSF	Examine Documents Review of Amended Plan and Open Issues for AHC	.80	716.00
05/26/21 JSF	Telephone Call(s) Participate Telephonically in Disclosure Statement Hearing	4.50	4,027.50
05/26/21 JSF	Examine Documents Review of Blacklines to Amended Plan	.50	447.50



OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 86

July 14, 2021  
BILL NO. 217695

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/28/21 JSF	Examine Documents Attention to Plan Issues re: Remaining Open Items	.80	716.00
05/28/21 MLC	Analysis of Memorandum Review of KL memo re remaining open issues	.90	1,260.00
TOTAL PHASE PU11		422.90	\$520,361.50
		TOTAL FOR SERVICES	\$683,168.00

# **EXHIBIT F**

## **Summary of Expenses**

**DISBURSEMENTS FOR THE APPLICATION PERIOD**

<b>Expense Category</b>	<b>Service Provider (if applicable)</b>	<b>Total Expenses</b>
Electronic Research	Westlaw	\$887.21
<b>TOTAL:</b>		<b>\$887.21</b>

# **EXHIBIT G**

## **List of Expenses**

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 20186/0002  
Page 87

July 14, 2021  
BILL NO. 217695

DISBURSEMENTS FOR YOUR ACCOUNT

Electronic Research

887.21

TOTAL DISBURSEMENTS

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887.21